Case:18-04911-EAG11 Doc#:26 Filed:09/03/18 Entered:09/04/18 03:04:19 Desc: Main Document Page 1 of 67

B1040 (FORM 1040) (12/15)

ADVERSARY PROCEEDING COVER SHEE (Instructions on Reverse)	ADVERSARY PROCEEDING NUMBER (Court Use Only)	
PLAINTIFFS	DEFENDANTS	
ARQUIDIOCESIS DE SAN JUAN DE PUERTO RICO	YALI ACEVEDO FELICIANO ET ALS. BANCO POPULAR DE PUERTO RICO	
ATTORNEYS (Firm Name, Address, and Telephone No.) C. CONDE & ASSOC. SAN JOSE ST. #254 SUITE 5 SAN JUAN, PR. 00901 TEL: 787-729-2800	ATTORNEYS (If Known) BAUZA, BRAU, IRRIZARRY, OJEDA & SILVA PO BOX 13669 SAN JUAN, PR 00908 TEL.: 787-710-8262	
PARTY (Check One Box Only) Debtor U.S. Trustee/Bankruptcy Admin Creditor Other Trustee CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE REQUEST FOR EXTENSION OF AUTOMATIC STAY PROVISIONS UNDER PRELIMINARY INJUNCTION AND PERMANENT INJUNCTION; VIOLATION SANCTIONS UNDER 11 USC 105	2 11 USC 105: REQUEST FOR TEMPORARY RESTRAINING ORDER.	
NATURE ((Number up to five (5) boxes starting with lead cause of action as 1	보는 사람들 바람이 하나 있다. 본 사람들은 하는 것들은 사람들은 사람들은 사람들은 사람들은 사람들은 사람들은 사람들이 되었다.	
FRBP 7001(1) — Recovery of Money/Property 11-Recovery of money/property - §542 turnover of property 12-Recovery of money/property - §547 preference 13-Recovery of money/property - §548 fraudulent transfer 14-Recovery of money/property - other	FRBP 7001(6) - Dischargeability (continued) 61-Dischargeability - §523(a)(5), domestic support 68-Dischargeability - §523(a)(6), willful and malicious injury 63-Dischargeability - §523(a)(8), student loan 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support)	
FRBP 7001(2) - Validity, Priority or Extent of Lien 21-Validity, priority or extent of lien or other interest in property	65-Dischargeability - other FRBP 7001(7) - Injunctive Relief	
FRBP 7001(3) – Approval of Sale of Property 31-Approval of sale of property of estate and of a co-owner - §363(h)	71-Injunctive relief – imposition of stay 72-Injunctive relief – other	
FRBP 7001(4) - Objection/Revocation of Discharge 41-Objection / revocation of discharge - §727(c),(d),(e)	FRBP 7001(8) Subordination of Claim or Interest 81-Subordination of claim or interest	
FRBP 7001(5) - Revocation of Confirmation 51-Revocation of confirmation	FRBP 7001(9) Declaratory Judgment 91-Declaratory judgment	
FRBP 7001(6) – Dischargeability 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny	FRBP 7001(10) Determination of Removed Action 01-Determination of removed claim or cause Other SS-SIPA Case – 15 U.S.C. §§78aaa et.seq. 02-Other (e.g. other actions that would have been brought in state court	
(continued next column)	if unrelated to bankruptcy case)	
☐ Check if this case involves a substantive issue of state law	$\hfill\Box$ Check if this is asserted to be a class action under FRCP 23	
□ Check if a jury trial is demanded in complaint	Demand \$ TO BE DETERMINED BY THE COURT	
Other Relief Sought		

Case:18-04911-EAG11 Doc#:26 Filed:09/03/18 Entered:09/04/18 03:04:19 Desc: Main Document Page 2 of 67

B1040 (FORM 1040) (12/15)

BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES			
NAME OF DEBTOR		BANKRUPTCY CASE NO.	
ARQUIDIOCESIS DE SAN JUAN DE PUERTO RICC)	18-04911 (EAG)	
DISTRICT IN WHICH CASE IS PENDING		DIVISION OFFICE	NAME OF JUDGE
PUERTO RICO		SAN JUAN	HON. EDWARD A. GODOY
RELATED A	DVERSARY P	PROCEEDING (IF ANY)	
PLAINTIFF DEFENDANT			ADVERSARY
			PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING		DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF)			
Land of the second of the seco			
DATE PRINT NAME OF ATTORNEY (OR PLAINTIFF)			EY (OR PLAINTIFF)
09/03/2018		CARMEN D. CONDE TORRES, ESQ. LUISA S. VALLE CASTRO, ESQ.	
		LOIDA G. VALLE GAOTIO, EC	

INSTRUCTIONS

The filing of a bankruptcy case creates an "estate" under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor's discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also must complete and file Form 1040, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court's Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 1040 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff's attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

Plaintiffs and Defendants. Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

Attorneys. Give the names and addresses of the attorneys, if known.

Party. Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

Demand. Enter the dollar amount being demanded in the complaint.

Signature. This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:	CASE NO: 18-04911 (EAG)
ARQUIDIOCESIS DE SAN JUAN DE PUERTO RICO	CHAPTER 11
Debtor	
ARQUIDIOCESIS DE SAN JUAN DE PUERTO RICO	ADVERSARY PROC. NO
Plaintiff	
V	
YALI ACEVEDO FELICIANO et als.	REQUEST FOR EXTENSION OF AUTOMATIC STAY PROVISIONS
Defendants	UNDER 11 USC 105; REQUEST FOR TEMPORARY RESTRAINING ORDER,
BANCO POPULAR DE PUERTO RICO	PRELIMINARY INJUNCTION AND PERMANENT INJUNCTION;
Party in Interest	VIOLATION OF THE AUTOMATIC STAY PROVISIONS 11 USC 362 AND SANCTIONS UNDER 11 USC 105

COMPLAINT FOR A PRELIMINARY INJUNCTION, PERMANENT INJUNCTIVE RELIEF AND VIOLATION OF THE AUTOMATIC STAY

TO THE HONORABLE COURT:

COMES NOW, the Debtor, Arquidiócesis de San Juan de Puerto Rico ("The Archdiocese"), through the undersigned attorney and very respectfully STATES and PRAYS:

INTRODUCTION

The Archdiocese is an unincorporated religious association and ecclesiastical territory or diocese of the Roman Catholic Church, limited to the northeast portion of the island of Puerto Rico. It was canonically erected on August 8, 1511. It was originally known as the Diocese of

Puerto Rico. On November 21, 1924 its name was changed to the Diocese of San Juan in Puerto Rico, upon the creation of a separate entity; the Diocese of Ponce. Thereafter, with the creation of the Diocese of Arecibo on April 30, 1960, San Juan was raised to the status of an "archdiocese" in part due to the large area and population it served, with an Archbishop appointed to lead the ecclesiastical territory. Thereafter, the Diocese of Caguas was canonically erected on November 4, 1964, the Diocese of Mayaguez on March 1, 1976 and the Diocese of Fajardo-Humacao on May 11, 2008.

The Archdiocese of San Juan is currently composed of six (6) episcopal geographical regions as follows: (i) Vicary of Bayamón, (ii) Vicary of Carolina, (iii) Vicary of El Toa and La Plata, (iv) Vicary of Guaynabo/Puerto Nuevo, (v) Vicary of Río Piedras and (vi) Vicary of San Juan/Santurce. There are approximately 142 Parishes, also separate entities, and 134 chapels dedicated to the religious mission of the Catholic Church located within the vicaries.

Currently, the Archdiocese has 66 direct employees¹, providing also approximately 200 indirect jobs. Nevertheless, it is of utmost importance that aside from the direct and indirect jobs that the Archdiocese provides, its outreach impacts approximately 1,000,000 Catholics through the associated parishes, chapels, catholic schools, special institutions, seminars, homes and sanctuaries.

On August 29, 2018, the Archdiocese filed for relief pursuant to the provisions of Chapter 11 of the Bankruptcy Code. The Archdiocese's Chapter 11 bankruptcy filing was prompted by the series of pre-judgment attachments made on account of an order entered by the First Instance Court, San Juan Part in the Cases Yalí Acevedo Feliciano et als. v. Iglesia Católica Apostólica y

¹ There are 75 employees considering the employees of Radio Paz, a related party to the Archdiocese.

Romana et als., Case No.: SJ2016cv00131, Sonia Arroyo Velázquez et als. v. Iglesia Católica Apostólica y Romana et als, Case No.: SJ2016cv00143 and Elsie Alvarado Rivera et als. v. Iglesia Católica Apostólica y Romana et als, Case No.: SJ2016cv00156 on March 27, 2018 ("The State Court Litigation"). These attachments not only were made to the bank accounts of the Archdiocese in Banco Popular de Puerto Rico ("BPPR"), but also to the BPPR bank accounts of the Parishes that are located within the archdiocese. The Parishes were never a party to the State Court Litigation and yet, due to the unlawful attachments made on their accounts they are currently facing a dire financial situation which has led them to practically cease operations. These attachments were approximately in the amount of \$4.7M of which approximately \$3.8M is an administrative freeze imposed to the accounts of the Parishes.

Upon the filing of the Archdiocese's bankruptcy petition the State Court Litigation was stayed by the Court of First Instance. BPPR released the funds under the EIN number of the Archdiocese.² Nevertheless, BPPR requires a Court Order to release administrative freeze over the funds that belong to the Parishes due to the threats made by the Defendants should the funds be released. The administrative freeze in the BPPR accounts implemented as a result of the prejudgment attachment order, has left the Parishes with no money to operate since their account balances have been frozen. The Parishes as of this date have no access to the funds in their bank accounts.

Even though the Archdiocese and the Parishes are separate entities they are interrelated.

Approximately 14% of the Archdiocese' income comes from the Parishes. If the Parishes are

² The amount of \$606,569.13 was attached by the Marshal of the First Instance Court, San Juan Part. Upon the filing of the bankruptcy petition the Archdiocese requested that the Marshal return these funds and the Marshal has refused to return the same.

rendered unable to operate, this will definitely affect the income of the Archdiocese and thus its ability to reorganize and provide payment to its creditors. More importantly, the Archdiocese may be rendered unable to continue the mission that it has conducted in Puerto Rico for over 500 years.

The Archdiocese also serves as guarantor to the Parishes in over \$6.5M loans owed to BPPR, among other guarantees provided to other banks. If the Parishes are unable to comply with their financial obligations to the banks because their funds remain frozen due to the prejudgment attachment of the Defendants, these amounts will be claimed to the Archdiocese's estate. Furthermore, the Archdiocese has an institutional obligation to assist the Parishes to continue the Catholic mission under the Archdiocese.

The prolongation of the administrative freeze of the accounts of the Parishes leads the Archdiocese no other alternative than to seek injunctive relief from this Honorable Court on urgent basis, in order to stop the irreparable harm being suffered by the Parishes and ultimately the Archdiocese and their mission. The only remedy in law available to the Parishes at this juncture is the extension of the automatic stay provisions to the Parishes and entry of an Order to BPPR to release the administrative freeze over the funds held at their respective accounts. The Parishes need the funds held at BPPR in order to operate, comply with their immediate financial obligations to their creditors, avoid interruption of essential services, be able to fulfill their mission to their congregations and provide the Archdiocese with their contribution. Moreover, the Parishes have the obligation to pay the health insurance and maintenance of the priests. If the Parishes do not have the funds to make such payments, the Archdiocese has the obligation to provide for such payments. This would constitute an administrative expense of the Archdiocese. Therefore,

immediate access to the funds under administrative freeze in the BPPR accounts of the Parishes, is an urgent remedy.

JURISDICTION

1. The jurisdiction of this Honorable Court arises from 28 USC 157 and 1334 and 11 USC 105, 11 USC 362, which allow the Court to issue any order which is necessary and appropriate to carry out the provisions of the Bankruptcy Code.

THE PARTIES

- The Archdiocese is an unincorporated Catholic religious association under EIN 66-0198351. Exhibit 1. Its address is PO Box 9021-967, San Juan, PR 00902-1967.
- 3. The Defendants Yalí Acevedo Feliciano and the other 183 people identified in Exhibit 2 (hereinafter "Defendants") are Plaintiffs in cases No.: SJ2016cv00131, SJ2016cv00141 and SJ2016cv00156 filed in 2016 at the First Instance Court, San Juan Part ("The State Court Litigation"). They have already filed a Notice of Appearance in the bankruptcy case through their legal counsel, German J. Brau Ramírez, whose address is PO Box 13669, San Juan, PR 00908.
- 4. Banco Popular de Puerto Rico ("BPPR") is a financial institution duly authorized to do business in Puerto Rico. Its address is 209 Muñoz Rivera Avenue, Popular Center Suite 913, Hato Rey, PR 00918. The Archdiocese joins BPPR to this adversary proceeding solely as a party in interest due to the fact that it is the entity which has been ordered to place an administrative freeze over the bank accounts at the behest of the Defendants' request, and to allow this Court to order the BPPR to release the funds held in an administrative hold.

THE FACTS

- 5. The Archdiocese is an unincorporated Catholic religious association, comprising the northeast portion of the island of Puerto Rico. It was canonically erected by Pope Julius II on August 8, 1511. What is known today as the Archdiocese of San Juan, was named at that time the Diocese of Puerto Rico. On November 21, 1924 its name was changed to the Diocese of San Juan in Puerto Rico, upon the creation of the Diocese of Ponce. With the creation of the Diocese of Arecibo on April 30, 1960, San Juan was raised to the status of an archdiocese, with the new Archbishop leading the ecclesiastical territory. Thereafter, the Diocese of Caguas was canonically erected on November 4, 1964, the Diocese of Mayaguez on March 1, 1976 and the Diocese of Fajardo-Humacao on May 11, 2008.
- 6. The Archdiocese of San Juan is composed of six (6) episcopal geographical regions as follows: (i) Vicary of Bayamón, (ii) Vicary of Carolina, (iii) Vicary of El Toa and La Plata, (iv) Vicary of Guaynabo/Puerto Nuevo, (v) Vicary of Río Piedras and (vi) Vicary of San Juan/Santurce. There are approximately 142 parishes and 134 chapels dedicated to the religious mission of the Catholic Church located within the vicaries. **Exhibit 3**
- 7. Currently, the Archdiocese has 66 direct employees, providing also approximately 200 indirect jobs. Nevertheless, it is of utmost importance that aside from the direct and indirect jobs that the Archdiocese provides, its outreach impacts approximately 1,000,000 Catholics through the associated parishes, chapels, catholic schools, special institutions, seminars, homes and sanctuaries.
- 8. On August 29, 2018, the Archdiocese filed for relief pursuant to the provisions of Chapter
 11 of the Bankruptcy Code. Since then, it has remained as Debtor in Possession, in

- compliance with all the requirements of the Bankruptcy Code and the US Trustee guidelines.
- 9. The Archdiocese's Chapter 11 bankruptcy filing was prompted by the series of <u>pre-judgment</u> attachments made on account of an order entered by the First Instance Court, San Juan Part in the State Court Litigation.
- 10. The State Court Litigation is centered on claims made by several beneficiaries to a multiple employer Pension Plan created by the Superintendence of the Catholic Schools of the Archdiocese of San Juan which was terminated in 2016. The Archdiocese was one of the participating employers. As of this date there is no adjudicated liability to any of the employers of the Pension Plan, nor has the case even gone to trial. Furthermore, the Parishes were not a named defendant in this case, nor were they an employers under the Plan.
- 11. Within one (1) week prior to the bankruptcy filing, Defendants caused the attachment of certain accounts holding the approximate amount of \$4.7M. These attachments were effected against the accounts of the Archdiocese and the Parishes, who were never part of the litigation.
- The majority of the funds are currently held in bank accounts located in BPPR which are currently subject to an administrative freeze. Of these funds \$3.8M are funds of the Parishes of the Archdiocese. Exhibit 4 There are still also certain funds of the Archdiocese that were garnished through the Marshal's Office of the Court of First Instance of Puerto Rico, San Juan Part.

- 13. In sum the total amounts that were garnished or subject to an administrative freeze are as follows³:
 - a. 21 accounts under Archdiocese's EIN and name in the total amount of \$606,569.13.

 These amounts were attached and a check was given to the marshal by BPPR for this amounts. Exhibit 5
 - b. 12 accounts with the Archdiocese's EIN, but in the name of related third parties, in the total amount of \$341,449.61. The attachment of the funds in these accounts was unperfected at the time of the bankruptcy filing. Therefore the funds were "released". 5 Exhibit 6
 - c. At least 160 accounts under the EIN and name of the Parishes in the total amount of \$3.8M. These although the attachment on these funds is unperfected, the accounts are currently subject to an administrative freeze pending entry of an order by this Court.⁶
- On the date of the filing of the bankruptcy petition the Archdiocese, through counsel, contacted BPPR in order to request the release of all of the frozen funds. Exhibit 8
- 15. Upon the filing of the Archdiocese's bankruptcy petition the State Court Litigation was stayed by the Court of First Instance and the case was closed. **Exhibit 9**⁷

³ These amounts were provided by BPPR but may be subject to change and verification by the Archdiocese.

⁴ After the automatic stay was entered, these funds have been requested but the Marshal has refused to return the same.

⁵ Even though BPPR informed the Archdiocese that it had "released" these accounts, the Archdiocese has been informed that BPPR has denied access to these funds.

⁶ BPPR requested on three (3) occasions that the state court clarify the extent of the attachment order to no avail. Exhibit 7. The Debtor requests authorization of this Honorable Court to submit this document in the Spanish language at this time and that it be allowed to submit a certified translation within the next thirty (30) days.

⁷ The Debtor requests authorization of this Honorable Court to submit this document in the Spanish language at this time and that it be allowed to submit a certified translation within the next thirty (30) days.

- 16. BPPR "released" the funds that were under the EIN number of the Archdiocese.⁸ Nevertheless, as a result of the pre-judgment attachment order, BPPR has maintained the administrative freeze of at least 160 accounts of the Parishes. The Parishes have little or no money to operate since their account balances have been frozen.
- 17. Upon information and belief, after the filing of the bankruptcy petition the Defendants, through counsel, have sought to enforce the attachment order and threatened BPPR with litigation, should the bank release the funds of the Parishes.
- 18. The inability of the Archdiocese and the Parishes to access the funds has severely impacted the entire operation and mission of the Parishes and the Archdiocese.
- 19. The Parishes need on urgent basis to have access to the frozen funds in the BPPR accounts to continue with their operation and their Catholic mission. The lack of funds to operate causes irreparable harm to the Parishes and consequently to the Archdiocese.
- 20. The Archdiocese needs to maintain its operation in order for the Catholic mission of the Church to evangelize through the Parishes. If the Parishes close because they cannot operate due to the lack of funds, the operations and mission of the Archdiocese will be hampered. This will not only impact the Archdiocese and the Parishes, but also approximately 1,000,000 Catholics in the Archdiocese of San Juan.
- 21. Moreover, the economic condition of the Archdiocese will worsen since BPPR will claim to the bankruptcy estate approximately \$6.5M in loans given to the Parishes and guaranteed

⁸ As stated above, even though BPPR informed the Archdiocese that it had "released" these accounts, the Archdiocese has been informed that BPPR has denied access to these funds.

- by the Archdiocese. Also, the Archdiocese will be subject to claims from other banks to which it has given guarantees on behalf of loans provided to the Parishes. Exhibit 10
- 22. Furthermore, the Parishes provide significant income to the Archdiocese. Should the Parishes stay the contributions to the Archdiocese, it will have less funds available to provide payment to its creditors through a Plan of Reorganization.

FIRST CASUE OF ACTION ENTRY OF A PRELIMINARY INJUNCTION EXTENDING THE AUTOMATIC STAY TO THE PARISHES AND THEREAFTER A PERMANENT INJUNCTION

- 23. The Archdiocese reaffirm as if literally transcribed paragraphs 1-22 of the Complaint.
- A request for *extension* of the *automatic stay* provisions of Section 362(a) to a non debtor constitutes an action for injunctive relief. In re Bora Bora, 424 B.R. 17, 24-25 (Bankr. D.P.R., 2010); See also Alan N. Resnick and Henry J. Sommer, 3 Collier on Bankruptcy, ¶362.04[1] (16th ed. 2010)("Rule 7001(7) provides that a request for injunctive relief is governed by part VII of the Bankruptcy Rules. This will mean that when the automatic *stay* of section 362 does not apply, injunctive relief will have to be sought by filing a complaint initiating an adversary proceeding and then seeking a temporary restraining order").
- The Courts may enjoin certain actions not subject to the automatic stay, such as an action against non debtor parties, has been recognized, when such action is interfering improperly with the purposes of the bankruptcy law or the debtor's reorganization efforts. In re Bora Bora Inc., 424 B.R. 17, 23 (Bankr. D.P.R. 2010) citing A.H. Robins Co., Inc. v. Piccinin, 788 F. 2d 994 (4th Cir. 1986).
- 26. Although called an extension of the automatic stay provisions of the Bankruptcy Code to non-debtor parties, these are in fact injunctions issued by a bankruptcy court under 11

- U.S.C. §105(a), after determining that the situation requires it in order to protect the interests of the bankruptcy estate. <u>In re Cincom iOutsource</u>, <u>Inc.</u>, 398 B.R. 223, 227 (Bankr. S.D. Ohio, 2008).
- 27. Under the Code, broad injunctive power is available under section 105, and the Court may use its discretion to extend the automatic stay to the Parishes under "extraordinary circumstances" like the ones being currently faced by these related parties to the Debtor.
- The court in analyzing whether to extend the protection of the automatic stay to the parishes must determine if the requirements of both Sections 362(a) and 105(a) are satisfied. <u>In re Bora Bora Inc.</u>, 424 B.R. at 24 referencing <u>In re Philadephia Newspapers</u>, LLC, 407 B.R. 606 (E.D. Pa. 2009).
- 29. Section 105(a) of the Code provides the substantive authorization for the bankruptcy court's injunctive powers. Ahern and MacLean, Bankruptcy Procedure Manual, 2002 Ed., §7065.02.
- 30. Federal Rule of Civil Procedure 65(a) governs the issuance of preliminary injunctions. FRCP 65(a). Bankruptcy Rule 7065 makes Rule 65 of the Federal Rules of Civil Procedure applicable to adversary proceedings. FRBP 7065. Courts typically consider the following factors in issuing a preliminary injunction:
 - a. that plaintiff will suffer irreparable injury if the injunction is not granted. If the Parishes cease their mission because they cannot operate due to the lack of funds, the operations of the Archdiocese and the Catholic mission of the Church in the Archdiocese will be frustrated, impacting approximately 1,000,000 Catholics.

- b. that such injury outweighs any harm which granting injunctive relief would inflict on the defendant. The unprecedented harm to the Archdiocese and its mission outweighs any monetary harm that the Defendants may suffer.
- that plaintiff has exhibited a likelihood of success on the merits- It is evident that the relationship of the Archdiocese with the Parishes and the interdependence in their operations and the Catholic mission warrants that the protection of the automatic stay be extended to the Parishes in order to avoid irreparable injury to the Parishes and consequently to the Archdiocese. If the Parishes are not protected at this juncture of the case, the reorganization of the Archdiocese would most likely be severely hindered in detriment of all creditors.
- d. that the public interest will not be adversely affected by the granting of the injunction.- The public interest WILL NOT be adversely affected. On the contrary, the relief requested protects the public interest of approximately 1,000,000 Catholics in the Archdiocese of San Juan whose ability to congregate and practice their faith will be protected. See Sunshine Development Inc. v. Federal Deposit Inc. Corp., 33 F.3d 106, 110-111 (1st Cir. 1994) (citing Narragansett Indian Tribe v. Guilbert, 934 F.2d 4, 5 (1st Cir. 1991); Aoude v. Mobil Oil Corp., 862 F.2d 890, 892 (1st Cir. 1988)); In re Public Serv. of N.H., 98 B.R. 120, 121 (Bankr. D.N.H. 1990); In re Metrobility Optical Sys., 2001 BNH 42 (Bankr. D.N.H. 2001).
- 31. The main purpose of this injunctive relief is to prevent unprecedented harm and disastrous consequences to the Archdiocese, the Parishes, the Catholic mission in the Archdiocese of San Juan as a whole, and most importantly the ability of the parishioners to practice their

- faith. This relief is to prevent future acts or omissions that constitute violations of the law or harmful conduct. <u>United States v. Oregon Med. Soc.</u>, 343 US 326 (1952)
- 32. Up to this date the Debtor and the Parishes face a financial crisis, which includes, but is not limited to:
 - a. Imminent hampering of operation of the Parishes which would redound in extreme limitation of the Catholic mission and the services provided to approximately 1,000,000 Catholics in the San Juan Archdiocese
 - b. Erosion of confidence in the Debtor and its Parishes by the public;
 - c. Delay in the on-time payment of the payroll of the employees of the Parishes needed to maintain the operations in the Parishes.
 - d. The lack of payroll payments has again impacted the stability of the staff of the Parishes and their ability to comply with their independent financial commitments.
 - e. The possible resignations of the employees the Parishes could most likely result in the closing of the Parishes or limitation of their services and their ability to continue with their mission and impacting the Archdiocese with its duty to provide its services to the Catholic community.
 - f. The inability of the Parishes to provide payment to the health plan which covers not only the employees but also the active priests and the retired priests, some which have health conditions that require immediate care and attention.

- g. The inability of the Parishes to comply with their financial obligations to their respective secured creditors, including but not limited to utilities, mortgages, governmental institutions and other vendors.
- h. The ability of the Parishes to conduct the charitable services and assistance that they provide to the homeless and underprivileged population in the archdioceses, including but not limited to programs like Cáritas, who helps those residents of Puerto Rico who lack sufficient means to have the basic needs like food, water, clothing and shelter. There are 91 Parishes that have a Cáritas program. The Cáritas program impacts hundreds of thousands of people in need.
- i. The income of the Archdiocese will also be affected since approximately 14% of the Archdiocese's income comes from the Parishes. Thus, the reorganization process will be affected since the funds available to pay creditors will be reduced.
- j. If the Parishes do not have immediate access to the funds that have been frozen in their BPPR accounts, their daily operations will be heavily impacted, including but not limited to the payments for maintenance, utilities, food, transportation etc. This does not include the impact to their Catholic mission. This will in turn have a direct impact in the operations of the Archdiocese and in its reorganization.
- k. Moreover, the Parishes have the obligation to pay the health insurance and maintenance of the priests. If the Parishes do not have the funds to make

such payments, the Archdiocese has the obligation to provide for such payments.

- In order to preserve the rights of the Archdiocese and the Parishes and to prevent irreparable injury pending a final determination on the merits of the complaint, it is urgent and of extreme necessity that a preliminary injunction be issued extending the automatic stay to the Parishes and providing access to the Parishes of the funds in the BPPR frozen accounts. This urgent remedy will not harm the public interest, on the contrary, it will operate in the benefit, of Archdiocese's reorganization process through the stability of the Parishes. The injunctive relief will also benefit approximately one million Catholics throughout the archdiocese.
- 34. The unprecedented and catastrophic injury suffered by the Archdiocese and the Parishes outweighs any damage that the Defendants may suffer, since theirs is a pre-judgment attachment in a case where there is no liability established as of this time. Furthermore, any concern that Defendants may have had regarding their inability to collect any amounts on account of a final judgment that they may achieve in the future, if any, from the assets of the Archdiocese is duly protected within the bankruptcy process and the safeguards provided by the Court and the Office of the United States Trustee.
- 35. The Archdiocese has the obligation under the Code to submit under penalty of perjury the Schedules, Statement of Financial Affairs and the Monthly Operating Reports which provide on a monthly basis a detail with the supporting evidence of the income and disbursement of the Archdiocese.

- 36. Furthermore, the Archdiocese may not dispose of property outside of the ordinary course of business without the authorization of the Court. Therefore, Defendants will suffer no harm if the automatic stay is extended to the Parishes and the funds in the accounts are released. On the contrary, the continued operation of the Parishes and the economic benefit they provide to the Archdiocese benefits all creditors, including the Defendants.
- 37. The Archdiocese will prevail on the merits of this Complaint. It is an undisputed fact that even though the Parishes and their operation are separate, they are interdependent to the Archdiocese.
- 38. As stated above, the Archdiocese is a guarantor to the Parishes in over \$6.5M in loans with BPPR. The Archdiocese is also a guarantor to the Parishes with other banks. If the Parishes are unable to provide payment to these loans, the Archdiocese, as guarantor to BPPR and the other banks will have this additional financial obligation, thus increasing the claims against the estate and the litigation which may arise in the bankruptcy proceedings that may be related to these claims.
- 39. Currently the majority of the Parishes have little or no disposable funds available. All of their funds were deposited in the BPPR accounts currently subject to the administrative freeze.
- 40. Moreover, due to the religious and economic relationship between the Archdiocese and the Parishes created by Canon law, the Archdiocese has an institutional obligation to reach the Catholic faithful through the Parishes in order to avoid the hampering of the Catholic mission in the archdiocese. Furthermore, the financial interaction between the Parishes and the Archdiocese is essential for their mission.

- The extension of the automatic stay to the Parishes for the limited purpose of protecting it from further attachments by the Defendants and releasing the funds in the BPPR accounts that are currently subject to an administrative freeze, is urgent and indispensable.
- 42. This is a case that has unusual circumstances which warrants and supports the extension of the automatic stay to the Parishes for the limited purpose of the release of the funds in the attached BPPR accounts and to avoid additional future embargoes by the Defendants.

SECOND CAUSE OF ACTION VIOLATION OF THE AUTOMATIC STAY PROVISIONS UNDER 11 USC 362

- 43. All allegations contained in paragraphs 1-42 are herein reaffirmed and referenced as if literally transcribed.
- 44. Section 362 (a) of the Bankruptcy Code provides in the relevant part as follows:
 - (a) Except as provided in subsection (b) of this section, a petition filed under section 301, 302, or 303 of this title... operates as a stay, applicable to all entities, of--
 - (1) the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title;
 - (2) the enforcement, against the debtor or against property of the estate, of a judgment obtained before the commencement of the case under this title;
 - (3) any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate;
 - (4) any act to create, perfect, or enforce any lien against property of the estate;
 - (5) any act to create, perfect, or enforce against property of the debtor any lien to the extent that such lien secured a claim that arose before the commencement of the case under this title

- (6) any act to collect, assess, or recover a claim against the debtor that arose before the commencement of the case under this title' (Our Emphasis)
- 45. Section 541 of the Bankruptcy Code defines "Property of the Estate" as:
 - (1) ...all legal or equitable interests of the debtor in property as of the commencement of the case.
 - (6) Proceeds, product, offspring, rents, or profits of or from property of the estate...
- 46. The Defendants have incurred in post petition actions which affect the finances of the Archdiocese, Archdiocese's rights and Archdiocese's interest in the Parishes as well as the bankruptcy estate.
- The actions of the Defendants, through counsel, to maintain the administrative freeze of the accounts of the Debtor and the Parishes in BPPR is in retaliation of the filing by the Debtor of the petition for relief under the provisions of Chapter 11 of the Bankruptcy Code.

 Thus, they are in violation of the automatic stay provisions. The Defendants had knowledge of the bankruptcy filing and yet they proceeded to inform BPPR of litigation, should the funds be released from their administrative freeze. Due to these communications, even though BPPR "released" certain accounts, as of this date, access and use of those funds has been denied. Thus, the actions of the Defendants constitute a willful violation of the automatic stay.
- 48. The Defendants' actions, in blatant disregard to the protections afforded to the Debtor by Section 362 of the Bankruptcy Code, are a violation of the automatic stay provisions.

 Sanctions and damages should be imposed.

- 49. The Defendants' actions demonstrate disrespect for the automatic stay and the bankruptcy court, who is the entity in charge of protecting the same.
- 50. A bankruptcy court may award the corresponding damages to a corporate entity debtor for violation of the automatic stay under its contempt powers pursuant to 11 U.S.C. §105(a). The Archdiocese requests that sanctions in the amount this Honorable Court deems reasonable, plus costs and attorney's fees be imposed.
- It is clear established law that the bankruptcy court has the authority to award sanctions to a creditor which violates the automatic stay provisions under its equitable powers under Section 105 of the Bankruptcy Code. <u>In re: Del Mission, Inc.</u>, 98 F. 3d. 1147 (9th Cir. 1996), In re: H Granados Communications, Inc., 503 BR 726, (BAP 9th Cir. 2013).

BOND REQUIREMENT

- 52. Pursuant to the provisions of 11 U.S.C. 7065, a temporary restraining order or preliminary injunction may be issued on application of a debtor, trustee, or debtor in possession without compliance with the requirements for security under F.R.Civ. P. 65(c).
- 53. In support of this Compliant the Archdiocese is submitting an unsworn declaration under penalty of perjury of Father Alberto Figueroa, the General Vicar of the Archdiocese.

Exhibit 11

WHEREFORE, the Archdiocese respectfully requests this Honorable Court that it grant this Complaint and provides the following remedies:

1. Enters a preliminary injunction and thereafter a permanent injunction, pursuant to Federal Rule of Civil Procedure 65(a) and Federal Rule of Bankruptcy Procedure 7065,

extending the protection of the automatic stay to the Parishes located in the Archdiocese of San Juan listed in Exhibit 2.

- 2. Enters a preliminary injunction and thereafter a permanent injunction, pursuant to Federal Rule of Civil Procedure 65(a) and Federal Rule of Bankruptcy Procedure 7065, enjoining the Defendants from attaching the funds of the parishes.
- 3. Enters a preliminary injunction and thereafter a permanent injunction, pursuant to Federal Rule of Civil Procedure 65(a) and Federal Rule of Bankruptcy Procedure 7065, ordering BPPR to release the attached funds in the accounts of the Parishes and any of the accounts of the Archdiocese subject to the administrative freeze detailed in Exhibit 3.
- 4. Determine that the Defendants have violated the automatic stay provisions.
- Impose sanctions on the Defendants for the damages caused to the Archdiocese and the Parishes in an amount this Honorable Court deems reasonable.
- 6. Orders the Defendants to pay the Archdiocese attorney's fees and costs related to this litigation.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3rd day of September, 2018.

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I HEREBY CERTIFY that on this same date I electronically filed the foregoing through the CM/ECF System, which will send notification of such filing to the parties detailed below registered to receive Notice including the US Trustee, to counsel for the Defendants, German Brau, Esq. and to counsel for BPPR Hermann Bauer, Esq.

C. CONDE & ASSOC.

Attorney for Debtor San Jose Street #254, 5th Floor San Juan, PR 00901-1253 Tel: (787) 729-2900

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USDC No.: 207312

<u>S/Luisa S. Valle Castro</u>

Luisa S. Valle Castro, Esq.

USDC No.: 215611

AUG-31a20188-049351-EAG11 18504#926VFMPEd:09/03/18 Entered:09/04/18 03974529 1736



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DEPARTMENT OF THE ASURY
INTERNAL REVENUE SERVICE
Washington, D.C. 20224



SMALL BUSINESS/SELF-EMPLOYED DIVISION Insolvency East, Territory 8, Group 4
City View Plaza II
48 Carr 165, Suite 2000
Guaynabo, PR 00968-8000

Date: August 31, 2018

Person to contact: Nathalie Pelaez

Employee Identification Number: 314176

Telephone Number: 787-522-1806

RE: Roman Catholic Church in Puerto Rico Arzobispado de San Juan EIN 66-0198351

Chapter 11 - 18-04911

EIN Letter

This is in response to your telephone request for information about your Employer Identification Number (EIN).

Our records indicate that you have been assigned EIN 66-0198351. Please keep this number in your permanent records. Your name and EIN, as shown above, should be entered on all Federal income tax forms, as well as all correspondence or documents submitted to the IRS. Other government agencies may also require you to provide your EIN on forms you submit to them.

Sincerely

Bankruptcy Specialist



LIST OF PLAINTIFFS

- 1. Yalí Acevedo Feliciano, John A. Williams Bermúdez and their conjugal partnership
- 2. Juan D. Albarrán Rodríguez
- 3. Carmen M. Almódovar Oliva
- 4. Miguel E. Alonso Reyes, Mary L. De Graux Villafaña and their conjugal partnership
- 5. Iraida Alvarado Garcés
- 6. Luis Aponte Santiago, Lourdes Isern and their conjugal partnership
- 7. Milagros Arroyo Reyes, José A. Solís Ríos and their conjugal partnership
- 8. Enid Ávila Cardona, Boris Corujo Orraca and their conjugal partnership
- 9. Ana Ayala Torres, Ramón Ortiz and their conjugal partnership
- 10. Esther C. Barrera
- 11. Gloria Caraballo Figueroa, Jorge Luis Leavitt and their conjugal partnership
- 12. Gloria M. Cerra Quiñones, Jaime López Díaz and their conjugal partnership
- 13. Ernesto N. Chiesa Figueroa, María E. Báez Bello and their conjugal partnership
- 14. Vilmarie Chiroldes Carbia
- 15. Mayradagmar Colón Nieves
- 16. Ramonita Covas Bernier
- 17. Maria M. Cruz Cassé, José F. Umpierre Rivera and their conjugal partnership
- 18. Luz D. Cruz Rodríguez
- 19. Ana Rosa Cuesta Del Valle

- 20. Francisco E. De Los Santos Aquino, María Del C. Ortiz Navarro and their conjugal partnership
- 21. Yolanda M. Elizondo Del Pino
- 22. Virgilio Espinal Wallace, Santa Lebrón Ferrera and their conjugal partnership
- 23. Aida Teresa Febres Hernández, Juan R. García Loubriel and their conjugal partnership
- 24. María José Fernández Magadán
- 25. Eneida Fernández Moreno
- 26. Clara E. Fernández Sissa
- 27. Sarita Font Rodríguez, José M. Castro Pavía and their conjugal partnership
- 28. Alfredo García, Maribel Casanova and their conjugal partnership
- 29. Liz García Dávila
- 30. Vanessa García Dávila, Héctor Jorge Monserrate and their conjugal partnership
- 31. Ivelisse García Vega, Francisco J. Miranda Del Valle and their conjugal partnership
- 32. Lymaris González Sierra, Reynaldo Ortiz and their conjugal partnership
- 33. Elba Gutiérrez Schmidt
- 34. Héctor Julián Lanzó Roldán, Lydia Rivera Flores and their conjugal partnership
- 35. José Manuel Leavitt Rey
- 36. Carmen E. Ledesma Méndez, Claudio E. Acarón Bonilla and their conjugal partnership
- 37. Clarita Lidin de Rom, Carlos Rom Goris and their conjugal partnership
- 38. Teresa López Guzmán

- 39. Ligia López Oliver
- 40. Christine M. Lugo Quesada
- 41. Carlixta Martínez Vilorio, Ronny Echevarría and their conjugal partnership
- 42. Milagros Matos Alvarez, Antonio Manuel Taveras and their conjugal partnership
- 43. Awilda Meléndez Ríos, Edwin Sánchez Maldonado and their conjugal partnership
- 44. Edda 1. Meléndez Rivera
- 45. Yeidy R. Oliver Hernández
- 46. Jesús Ortiz García, Marta Villamil Rodríguez and their conjugal partnership
- 47. Diana Ortiz Rodríguez
- 48. Nerirosa Otero Romero, Alberto Del Toro and their conjugal partnership
- 49. Carmen Priscilla Pavía Cabanillas
- 50. Francisca Ramírez, Luis Darío Tineo Sánchez and their conjugal partnership
- 51. Milagros Ramos, Alonso De Hoyos and their conjugal partnership
- 52. Juan M. Ramos Pizarro, Dora Carrasquillo Márquez and their conjugal partnership
- 53. Iraida Rinaldi Ríos, Fernando Quiñones Aponte and their conjugal partnership
- 54. Carlos Juan Rivera Padua, Noelia M. Torres Cotts and their conjugal partnership
- 55. Georgina Rivera Rodríguez
- 56. Diana Roche Rodríguez Ríos
- 57. Angela Rodríguez Colón, Pedro A. Del Valle Ferrer and their conjugal partnership
- 58. Genoveva Rodríguez Rosa

- 59. Carlos Ruiz Porrata, Sylvia Ramos Moreau and their conjugal partnership
- 60. Carmen C. Ruiz Rexach
- 61. Marlene Ruiz, Jorge A. Saldarriaga Barragán and their conjugal partnership
- 62. María Victoria Saiz Martínez, Ramiro Jordán Sarria and their conjugal partnership
- 63. Oscar Sánchez Del Campo Delgado
- 64. Diana Sardiña Hernández, Jorge Escobar and their conjugal partnership
- 65. Yolanda Seda Benítez, Manuel A. Pérez Sánchez and their conjugal partnership
- 66. Estrella Sissa De León
- 67. Cristina Soriano
- 68. Amelia Sotomayor Díaz
- 69. Ramona Stokes Gimenez
- 70. Luis Darío Tineo Sánchez, Francisca Ramírez Núñez and their conjugal partnership
- 71. Rita T. Toro Monserrate, Miguel A. Hernández Feliciano and their conjugal partnership
- 72. Noelia Torres Cotts, Carlos J. Rivera Padua and their conjugal partnership
- 73. Lianis Z. Vélez Pérez, Julio Rodríguez Odum and their conjugal partnership
- 74. Sonia Arroyo Velázquez, Jesús M. Franco Villafañe and their conjugal partnership
- 75. Héctor Luis Báez Rodríguez
- 76. Ana Teresita Borges Rodríguez
- 77. Alicia Castillo Peña, William Mangual Martínez and their conjugal partnership

- 78. Miriam Cortés Pérez
- 79. Elsie De Jesús Rosado
- 80. Isabel Del Valle Rivera
- 81. Sara J. Disdier Caballero
- 82. Elena Durán Sobrino
- 83. María M. Espinosa Miranda, Ariel Pagán Rodríguez and their conjugal partnership
- 84. Marlia Feliciano Santana, Carlos M. Meléndez and their conjugal partnership
- 85. Amarilis Flores Ruiz, Alfonso García Ruiz and their conjugal partnership
- 86. Eva J. Freire, Félix J. Lugo Soto and their conjugal partnership
- 87. Ivette Fuentes Febles
- 88. Glenda García Martínez
- 89. María T. Geswaldo Medina
- 90. Sandra Ivette Grau Morales, Pedro R. Villalta Bernabe and their conjugal partnership
- 91. Ivelisse Laboy Ruiz, Mark A. Neste and their conjugal partnership
- 92. Mari Angelie Lamboglia Vila, José F. Adrover Robles and their conjugal partnership
- 93. Ana Doris Lladó Silva
- 94. Leslie Janette López Báez, Juan Carlos González Rodríguez and their conjugal partnership
- 95. Nilsa López Marcano
- 96. Tensy Machargo Enríquez

- 97. Omayra Marrero Santiago, Miguel Ángel Lozada and their conjugal partnership
- 98. Florin M. Martínez Fontán, Ángel M. De La Rosa Schuck and their conjugal partnership
- 99. Nilda Martínez Méndez, Eliezer Tulier Polanco and their conjugal partnership
- 100. Janice Mercado Corujo, Vicente Román Arriaga and their conjugal partnership
- 101. Nereida Montes Burgos, Samuel Monge Pérez and their conjugal partnership
- 102. Lillian Otero Cabrera
- 103. Alma Padilla Morales
- 104. Minu Derbhis Pagán Ramos, Ismael Placa Estremera and their conjugal partnership
- 105. Ana L. Pérez Pérez
- 106. Eileen Pérez Reyes, José Javer Santos Mimoso and their conjugal partnership
- 107. Lourdes Puig Sánchez, Carlos E. Chapel Palerm and their conjugal partnership
- 108. Ayricell Quintana Muñiz
- 109. Sonia M. Ramos González, Reinaldo Santana and their conjugal partnership
- 110. Nilda Rivas Laboy, Juan Medina Castro and their conjugal partnership
- 111. Pedro Rivera Ortiz
- 112. Margarita Rivera Rosado
- 113. Wanda Rivera Vega, Ernesto Maldonado Ojeda and their conjugal partnership
- 114. Evelyn D. Rodríguez Soto
- 115. Gladys J. Rodríguez Suliveres;
- 116. Brenda Rodriguez Toro De Damiani, Nicholas Damiani López and their conjugal partnership

- 117. Yolanda Rodríguez Toro De Gil, Luis A. Gil Borgos and their conjugal partnership
- 118. Jeanette Roig López, José A. Rivera And Their Conjugal Partnership
- 119. Eddie W. Santiago Figueroa
- 120. Carmen J. Santiago Hernández
- 121. Fe Migdalia Santiago Padilla
- 122. Carmen Santini Rivera
- 123. Dora Elisa Soler Muñiz
- 124. Magda E. Toledo Rodríguez
- 125. Tahira E. Vargas Gómez, Joan Vargas and their conjugal partnership
- 126. Leonor Vélez Ortiz, Israel Menchaca Dobal and their conjugal partnership
- 127. Yolanda Vélez Rosado, Fernando Sánchez Saldaña Dobal and their conjugal partnership
- 128. Brenda Wharton Flores
- 129. Elsie Alvarado Rivera, Isidoro Hernández and their conjugal partnership
- 130. Esther M. Alvarez Meléndez, Javier O. Torres and their conjugal partnership
- 131. Margarita Álvarez Rodríguez
- 132. Lionel Arroyo Carrero
- 133. Ada L. Arroyo Sánchez, José A. Hernández Nieves and their conjugal partnership
- 134. Zenaida Basora Urrutia, Mermes Román Amador and their conjugal partnership
- 135. Luis A. Carrión Pérez

- 136. Silvia E. Casiano Tellado, Gerardo F. López Muñoz and their conjugal partnership
- 137. Bárbara V. Casiano Velázquez
- 138. Luisa M. Castro Rivera, Jaime Luis García Garda and their conjugal partnership
- 139. Carmen M. Crespo
- 140. Andrés Durán Castaños, Vanessa Figueroa González and their conjugal partnership
- 141. Zonya Espinosa Tarniella
- 142. Dora Fernández Padilla
- 143. Gladys M. Figueroa Gautier, Richard Zambrana and their conjugal partnership
- 144. Audilia Fuentes Santos
- 145. Lourdes Godén Gaud, Eliud A. Serrano González and their conjugal partnership
- 146. Jossie A. González Ventura, Edgardo Reyes Morales and their conjugal partnership
- 147. Rosa D. Hernández Rosado, Ricardo Lebrón Maldonado and their conjugal partnership
- 148. Janine Hidalgo Santiago, Héctor Martínez Tosado and their conjugal partnership
- 149. Alice M. Huyke Souffront, Carlos E. Jiménez Torres and their conjugal partnership
- 150. Olga M. Jaume Tapia, Antonio Ginés Montalvo and their conjugal partnership
- 151. María L. Julia Julia, Miguel Ángel Ríos Gerena and their conjugal partnership
- 152. Ana R. Julia Savarit
- 153. Linda López Arriaga, José Reyes Rosario and their conjugal partnership

- 154. Arlene López Cancel
- 155. Luis A. Martínez Vázquez
- 156. Felícita Montañez Figueroa, Miguel A. Albarrán Reyes and their conjugal partnership
- 157. Asmara Morales Yepes
- 158. Carmen T. Morris Zamora
- 159. Vivian Ortiz Schettini;
- 160. María De Los A. Pacheco Rodríguez, Alfred Demel and their conjugal partnership
- 161. Yanira Padilla Santiago
- 162. Eliezer Parrilla Meléndez, María García Montañez and their conjugal partnership
- 163. Liza Polanco Pagán, Walter Ricardo Bonilla Santaliz And Their Conjugal Partnership
- 164. Myrna Quijano Guillama
- 165. Sonia Rivera Colón, Jorge Ariel Vázquez Román and their conjugal partnership
- 166. Iris Rodríguez Delgado
- 167. Ángel F. Rolón Rivera, Maria Teresa Del Valle and their conjugal partnership
- 168. Ginnette Rosado Sánchez, Eugenio René Chinea and their conjugal partnership
- 169. Javier Rosado Torres, Maria S. Urango Salcedo and their conjugal partnership
- 170. Fanivel Rosario Santiago
- 171. Adela Sabatier Águila, Rudy E. Mayol Kauffmann and their conjugal partnership

- 172. Ana Sierra Díaz, César Manuel Sierra Rondón and their conjugal partnership
- 173. Mayra E. Soto Guzmán, José A. Candelaria Maldonado and their conjugal partnership
- 174. Nelly-Ann Suárez Pesante
- 175. Ana M. Tirado Colón, Yarim E. Cros Vázquez and their conjugal partnership
- 176. Clara L. Tirado Rios, Samuel López Pérez and their conjugal partnership
- 177. Aurin Valcarcel Cervera
- 178. Mirtelina Vázquez Robles, José V, Torres Rivera and their conjugal partnership
- 179. Miriam Villardefrancos Vergara
- 180. Lourdes M. Zegrí Prieto, Carlos E. Rentas Giusti and their conjugal partnership
- 181. Julio A. Camacho Mattei, Evelyn Pietri Soto and their conjugal partnership.
- 182. Mercedes Fernandez
- 183. Sara Mejia Castaings de Corrada
- 184. Dora Muñiz Ramos
- 185. Gladys Vazquez Acevedo, Jose A. Rosado Ortiz, and their conjugal partnership.

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	068	Parroquia Resurrección del Señor (068)	66-0378250
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	076 077	Parroquia Nuestra Señora de la Candelaria (076) Parroquia San José Obrero (077)	66-0366199
	078	Parroquia Jesús Mediador (078)	66-0743195
	079	Parroquia Santa Bernardita (079)	66-0445023
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	081	Parroquia Santísima Trinidad (081)	66-0424088
	082	Parroquia Epifanía del Señor (082)	66-0709367
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	087	Parroquia Corpus Christi (087)	66-0725281
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	097 099	Parroquia Cristo Redentor (099)	66-0758996
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	101	Parroquia Nuestra Señora Reina de los Angeles (101)	66-0673867
	102	Parroquia San Pío X (102)	66-0732119
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	104	Parroquia San Juan María Vianney (104)	66-0742746
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	114	Parroquia Nuestra Señora de la Medalla Milagrosa (114)	
	115	Parroquia San Antonio de Padua (115)	66-0275919
89	116	Parroquia San Fernando Rey (116)	66-0508754
	118	Parroquia Nuestra Señora de la Caridad del Cobre (118)	
91	119	Parroquia Santa Catalina de Labouré (119)	66-0743453
92	120	Parroquia Asención del Señor (120)	66-0494353
	122	Parroquia San Juan Bautista de La Salle (122)	66-0466498
	123	Parroquia Santa Elena (123)	66-0725638
	124	Parroquia Santísima Trinidad (124)	66-0667434
	125	Parroquia Sagrada Familia (125)	66-0626281
	126	Parroquia Santos Apóstoles Pedro y Pablo (126)	66-0725642
	128	Parroquia Santa María de Caná (128)	66-0751198
	129	Parroquia San Judas Tadeo (129)	66-0754535
	131	Parroquia Santa Teresa de Jesús (131)	66-0696362
	132	Parroquia Nuestra Señora del Carmen (132)	66-0779083
	133	Parroquia Santo Domingo de Guzmán (133)	66-0729598
	135	Parroquia Nuestra Señora de la Monserrate (135)	66-0520935 66-0688258
	136	Parroquia San Bartolomé (136)	66-0723201
	137	Parroquia Santa Teresa de Jesús Jornet (137)	66-0725641
100,000	138	Parroquia San Francisco de Monte Alvernia (138) Parroquia María Madre de la Misericordia (139)	66-0471676
	139 141	Parroquia San Francisco de Asís (141)	66-0655719
	143	Parroquia Espíritu Santo (143)	66-0780917
	146	Parroquia Divino Niño Jesús (146)	66-0722572
	147	Parroquia San Francisco de Asís (147)	66-0746101
	148	Parroquia Nuestra Señora de Fátima (148)	66-0742751
	149	Parroquia Corazón de Jesús (149)	66-0725639
	151	Parroquia Nuestra Señora del Rosario (151)	66-0756438
	152	Parroquia Nuestra Señora de la Paz (152)	66-0581668
	156	Parroquia San José (156)	66-0727070
	157	Parroquia Cristo Salvador (157)	66-0744672
	159	Parroquia San Judas Tadeo (159)	66-0569377
	005	Parroquia María Auxiliadora (005)	66-0287748
	008	Parroquia Nuestra Señora de la Monserrate (008)	66-0743198
	009	Parroquia Nuestra Señora del Perpetuo Socorro (009)	66-0221761
122	018	Parroquia Espíritu Santo (018)	66-0760982
	021	Parroquia Nuestra Señora de la Medalla Milagrosa (021)	66-0267899
124	026	Parroquia Nuestra Señora de la Altagracia (026)	66-0639144
	045	Parroquia Exaltación de la Santa Cruz (045)	66-0711309
	047	Parroquia Nuestra Señora del Perpetuo Socorro (047)	66-0369966
		Parroquia Santa Catalina de Siena (050)	66-0533241
	052	Parroquia San Miguel Arcángel (052)	66-0273612
	061	Parroquia San Pedro Mártir de Verona (061)	66-0433781
	074	Parroquia San Francisco de Sales (074)	66-0437667
	085	Parroquia Nuestra Señora de la Caridad del Cobre (085)	66-0726357
	086	Parroquia Nuestra Señora de Lourdes (086)	66-0696854
	105	Parroquia Santa Rosa de Lima (105)	66-0708265
	117	Parroquia Nuestra Señora Madre de la Divina Providencia (117)	66-0718646
135	121	Parroquia Santo Domingo de Guzmán (121)	66-0666799

	130	Parroquia Nuestra Señora de la Salud (130)	
	134	Parroquia Nuestra Señora de Covadonga (134)	66-0752671
	142	Parroquia La Resurrección del Señor (142)	66-0541642
139	144	Parroquia San Juan de la Cruz (144)	66-0486548
140	145	Parroquia María Madre de mi Señor (145)	66-0723202
141	153	Parroquia María Llena de Gracia (153)	66-0782587
142	158	Parroquia San Esteban Protomartir (158)	66-0606668
	001-a	Capilla Santo Cristo (001-a)	
2		Capilla San José (001-b)	
3		Capilla Santa Ana (001-c)	
4		Capilla San Conrado (002-a)	
5		Capilla Sagrado Corazón (005-a)	
6		Capilla Nuestra Señora de la Altagracia (005-b)	
7			
	005-0	Capilla Nuestra Señora de Fátima (005-c)	
8	000-0	Capilla Santísima Trinidad (005-d)	
9		Capilla San Martín de Porres (006-a)	
10		Capilla de la Universidad del Sagrado Corazón (006-b)	
11		Capilla Nuestra Señora de la Providencia (007-a)	
12		Capilla Doctors Hospital (007-b)	
13		Capilla Santa Ana (008-a)	
14		Capilla La Milagrosa (013-a)	
15	013-b	Capilla Nuestra Señora del Rosario (013-b)	
16	013-с	Capilla San Martín de Porres (013-c)	
17		Capilla Sagrada Familia (016-a)	
18	019-a	Capilla Egida del Maestro (019 b)	~ .
19		Capilla Nuestra Señora Reina de la Paz (023-a)	
20		Capilla San José de Calasanz (023-b)	
21		Capilla Nuestra Señora del Camino (024-a)	
22		Capilla Integrada al Templo de Parroquia Maria Madre de la Iglesia (025-a)	
23		Capilla Santa Teresita del Niño Jesús (028-a)	
24		Capilla Hogar Crea (028-b)	
25		Capilla Nuestra Señora del Buen Consejo (030-a)	
26		Capilla San Antonio María Claret (032-a)	
27		Capilla San Francisco de Asís (040-a)	
28		Capilla San Martín de Porres (048-a)	
29		Capilla Nuestra Señora del Buen Consejo (048-b)	
30		Capilla San Miguel (052-a)	
31		Capilla San José (053-a)	
32		Capilla Nuestra Señora del Carmen (053-b)	
33		Capilla Sagrado Corazón de Jesús (053-c)	
34	058-a	Capilla San Martín de Porres (058-a)	
35	058-Ъ	Capilla San José Obrero (058-b)	
36	060-a	Capilla San Francisco de Asís (060-a)	
37		Capilla Nuestra Señora de la Caridad del Cobre (063-a)	
38		Capilla Nuestra Señora de la Esperanza (065-a)	
39		Capilla Virgen de la Paz (070-a)	
40		Capilla Divino Niño Jesús (071-a)	
41		Capilla Nuestra Señora del Carmen (072-a)	
42		Capilla Jesús Nazareno (073-a)	
43		Capilla Santo Domingo de Guzmán (074-a)	
44		Capilla María Auxiliadora (074-b)	
45	074-0	Capilla Maria Auxiliadora (074-0) Capilla San Judas Tadeo (Santuario) (074-c)	
200000			
46		Capilla Inmaculada Concepción (074-d)	
47		Capilla Santa Teresita (075-a)	
48		Capilla Nuestra Señora de Guadalupe (075-b)	
49		Capilla San José (075-c)	
50	075-d	Capilla San Pablo (075-d)	
51		Capilla La Virgen de la Providencia (075-e)	
52		Capilla Cristo Rey (076-a)	
53		Capilla Santa María La Mayor (076-b)	
54		Capilla Santísima Trinidad (076-c)	
55	076-d	Capilla Buen Pastor (076-d)	
56		Capilla Nuestra Señora del Carmen (077-a)	
57		Capilla San Martín de Porres (077-b)	
58		Capilla Santa Rosa (083-a)	
59		Capilla San Antonio (083-b)	
60		Capilla Santísima Trinidad (085-a)	
61		Capilla Santo Domingo de Guzmán (087-a)	
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62	088-a	Capilla Hogar Santa Teresa Jornet (088-a)	
63		Capilla San Agustín (088-b)	
64		Capilla La Sagrada Familia (089-a)	
65		Capilla San José (090-a)	
66		Capilla Nuestra Señora del Carmen (090-b)	
67	090-с	Capilla Sagrado Corazón de Jesús (090-c)	
68	092-a	Capilla San Francisco de Asís (092-a)	
69	092-b	Capilla María Auxiliadora (092-b)	
70	092-с	Capilla Divino Niño Jesús (092-c)	
71		Capilla Cristo Rey (092-d)	
72	100-a	Capilla Funeraria Ehret (100-a)	
73		Capilla Nuestra Señora del Rosario (102-a)	
74		Capilla La Milagrosa (104-a)	
75	104-b	Capilla Cristo del Perdón (104-b)	
76		Capilla Dulce Nombre de María (104-c)	
77		Capilla Nuestra Señora del Carmen (104-d)	
78		Capilla La Milagrosa (108-a)	
79		Capilla Nuestra Señora del Carmen (114-a)	
80		Capilla San Martín de Porres (115-a)	
81		Santuario Cristo de la Reconciliación (115-b)	
82		Capilla San Antonio (116-a)	
83		Capilla Nuestra Señora de Fátima (117-a)	
84		Capilla La Resurrección (117-b)	
85		Capilla Nuestra Señora del Carmen (117-c)	
86 87		Capilla Sagrada Familia (117-d) Capilla San Ricardo (117-e)	
88		Capilla San Ricardo (117-e) Capilla Medalla Milagrosa (119-a)	
89		Capilla San Pablo (119-b)	<u> </u>
90	128-2	Capilla San Gerardo Mayela (128-a)	
91		Capilla Sagrado Corazón (128-b)	
92		Capilla Madre del Divino Pastor (129-a)	
93		Capilla Virgen del Carmen (129-b)	
94		Capilla San Martin de Porres (131-a)	
95		Capilla Convento Misioneras de la Caridad (131-b)	
96		Capilla Santísima Trinidad (133-a)	
97		Capilla Nuestra Señora de la Providencia (133-b)	
98		Capilla Carlos Manuel Rodríguez (133-c)	
99		Capilla Nuestra Señora de Lourdes (134-a)	
100		Capilla San Martín de Porres (134-b)	
101		Capilla Divino Niño Jesús (134-c)	
102		Capilla Cristo Rey (135-a)	
103		Capilla Santa Mónica (135-b)	
104		Capilla San Martín de Porres (137-a)	
105		Capilla Nuestra Señora de la Salud (137-b)	
106		Capilla Nuestra Señora del Carmen (145-a)	
107		Capilla San Rafael Arcángel (146-a)	
103	146-b	Capilla Jesús Nazareno (146-b)	
109		Capilla El Buen Pastor (146-c)	
110		Capilla Nuestra Señora de la Paz (146-d)	
111		Capilla Espíritu Santo (147-a)	
112		Capilla San José de la Montaña (147-b)	
113		Capilla La Inmaculada Concepción (147-c)	
114		Capilla Nuestra Señora del Carmen (148-a)	
115		Capilla Santa Teresa de Jesús (148-b)	
116		Capilla San Juan Bosco (149-a)	
117	149-b	Capilla Sagrada Familia (149-b)	
118		Capilla San Juan Bautista (151-a)	
119		Capilla Jesús Maestro (151-b)	
120		Capilla La Providencia (151-c)	
121		Capilla Nuestra Señora de la Divina Providencia (152-a)	
122		Capilla Espíritu Santo (152-b)	
123		Capilla Inmaculada Concepción (152-c)	
124		Capilla San José Obrero (152-d)	
125		Capilla Nuestra Señora del Camino (156-a)	
126 127		Capilla San Francisco de Asís (156-b)	
128		Capilla Cristo de los Milagros (156-c) Capilla Santa Teresita (156-d)	
129		Capilla Sagrada Familia (156-e)	
123	100.9	Capina Cagrada Famina (100-6)	1

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130	156-f Capilla Sagrado Corazón(156f)	
131 132	158-a Capilla Cristo Rey (158-a)	
132	158-b Capilla Nuestra Señora del Rosario (158-b)	
133	159-a Capilla San Martín de Porres (159-a)	
134	159-ь Capilla Santa Teresa de Jesús (159-ь)	

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Numero de Cuenta	Parroquia a parroq		d en Hold
152-003703 030-404851	PARROQUIA SAN JUAN DE LA CRUZ PARROQUIA LA RESURRECCION DEL SENOR	\$	15.75 23.87
	ROMAN CATHOLIC / PARROQUIA SAN MATEO	\$	55.00
015-246418 229-307103	PARROQUIA SANTA MARIA DE LOS ANGELES	\$	62.53
014-017644	PARROQUIA SANTA CECILIA - DANILO DE JESUS MARTINEZ-DUARTE	\$	148.64
030-476534	PARROQUIA NUESTRA SENORA DE LA PAZ	\$	150.00
435-119818	PARROQUIA NOLSTRA SENORA DE LA FAZ PARROQUIA ASUNCION DE LA VIRGEN - COMITE ACTIVIDADES PLANTA FISICA	\$	153.40
056-001193	PARROQUIA SAN PEDRO APOSTOL - COMITE PRO-FONDOSPARROQUIA SAN JOSE	\$	153.40
030-814286	PARROQUIA SAN JOSE OBRERO	\$	165.32
030-031540	PARROQUIA SAGRADA FAMILIA - CARITAS 125	\$	179.09
030-688698	PARROQUIA NSTRA SENORA DE LA ALTAGRACIA	\$	232,47
013-009710	PARROQUIA SAN VALENTIN	\$	275.17
030-688353	PARROQUIA SAN JUAN DE LA CRUZ	\$	363.03
110-868315	PARROQUIA SAN LUIS REY	\$	366.98
203-090797	PARROQUIA NSTRA SRA DE LA ESPERANZA	\$	412.64
039-430065	PARROQUIA LA MILAGROSA	\$	464.97
030-364493	PARROQUIA NSTRA SRA DE BELEN	\$	556.87
030-688531	PARROQUIA SANTA TERESA DE JESUS JORNET	\$	567.99
030-687926	PARROQUIA SAN JUAN DE LA CRUZ	\$	630.23
030-023297	PARROQUIA SAN LUIS REY - CARIDADES	\$	632,66
245-208261	IGLESIA SAN BARTOLOME	\$	633.89
030-023300	PARROQUIA SAN LUIS REY	\$	728.03
252-137959	PARROQUIA SANTO DOMINGO DE GUZMAN	\$	749.33
023-430060	IGLESIA SAN JUAN BOSCO	\$	855.66
056-101147	PARROQUIA SAN PEDRO APOSTOL	\$	909.71
030-859840	PARROQUIA NUESTRA SENORA REINA DE LA PAZ	\$	956.67
252-020487	PARROQUIA NTRA SRA DEL ROSARIO 151	\$	997.75
030-688361	PARROQUIA CORAZON DE JESUS	\$	1,000.00
030-025818	PARROQUIA SAN PABLO	\$	1,013.52
030-852358	PARROQUIA NUESTRA SENORA DEL PILAR (028)	\$	1,067.94
035-037466	PARROQUIA ASUNCION DE LA VIRGEN	\$	1,101.13
252-867447	PARROQUIA SANTO DOMINGO DE GUZMAN	\$	1,195.60
056-103328	PARROQUIA ESPIRITU SANTO 072	\$	1,203.70
038-212544	PARROQUIA SAN FERNANDO	\$	1,238.13
030-851483	PARROQUIA SAN JORGE - CARITAS PARROQUIAL 012	\$	1,434.16
240-043957	PARROQUIA SANTA TERESA DE JESUS	\$	1,460.70
012-430064	PADRES REDENTORISTAS PARROQ SAN AGUSTIN	\$	1,497.76
050-006215	PARROQUIA NUESTRA SRA DE LOS DOLORES	\$	1,547.45
030-688574	PARROQUIA NTRA SRA DE LA MONSERRATE	\$	1,600.94
013-011944	PARROQUIA CRISTO REY	\$	1,646.92
050-431080	PARROQUIA NUESTRA SRA DE LOS DOLORES - FONDO PRO CONSTRUCCION	\$	1,761.06
245-001377	PARROQUIA SAN PIO X	\$	1,846.42
012-085324	PARROQUIA SAN AGUSTIN	\$	1,874.55
106-430017	PARROQUIA CRISTO REY	\$	1,912.67
030-021995	PARROQUIA NTRA SENORA DEL ROSARIO	\$	1,929.92
030-846978	PARROQUIA SANTA TERESA DE JESUS	\$	2,009.46
016-270371	PARROQUIA STELLA MARIS	\$	2,031.97
414-209583	PARROQUIA SAN LUCAS	\$	2,048.38
030-688558	PARROQUIA SANTA BERNARDITA	\$	2,081.52
039-018113	PARROQUIA SAN JOSE OBRERO	\$	2,162.06
177-430044	PARROQUIA STELLA MARIS	\$	2,214.08
030-871883	PARR SAN FRANCISCO JAVIER	\$	2,269.12
030-410371	PARROQUIA SANTA CATALINA LA BOURET	\$	2,362.97
030-852641	PARR CRISTO REDENTOR - CARITAS 99	\$	2,419.85
022-358692	PARROQUIA SAN LUCAS - COMITE DE AYADA AL NECESITADO	\$	2,467.97
030-688205	DIVINO NINO JESUS PARROQUIA	\$	2,498.01
239-109433	NUESTRA SRA REINA DE LA PAZ (071)	\$	2,679.26
028-044045	PARROQUIA SAN PEDRO MARTIR		2,791.43
	PARROQUIA SAN LUCAS	\$	2,807.62
152-112324	PARROQUIA MARIA LLENA DE GRACIA DARROQUIA SANTA TERESA DE IESUS - CONSTRUCCION TEMPLO	\$	2,819.76 2,990.66
240-101876	PARROQUIA SANTA TERESA DE JESUS - CONSTRUCCION TEMPLO		
030-688345	PARROQUIA SANTA TERESA DE JESUS JORNET	\$	3,029.08
052-007294	PARROQUIA SANTIAGO APOSTOL	\$	3,045.82
	PARROQUIA SAN FRANCISCO DE ASIS	\$	3,064.54
035-296984	PARROQUIA JESUS MAESTRO	ş	3,113.38

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030-688566	PARROQUIA SAN ANTONIO DE PADUA	\$	3,143.68
030-404851	PARROQUIA LA RESURRECCION DEL SENOR	\$	3,200.00
035-430532	PARROQUIA JESUS MAESTRO	\$	3,353.28
014-104342	PARROQUIA CRISTO SALVADOR	\$ \$	3,362.28
015-004600	PARROQUIA SANTA TERESITA		3,395.92
030-828260	PARROQUIA LA GRUTA DE LOURDES (113)	\$	3,428.76
058-202838	PARROQUIA SENORA DE LA SALUD		3,470.00
314-008052	PARROQ NSTRA SRA VIRGEN DEL CARMEN 132	\$	3,617.80
030-067200	PARROQUIA SAGRADOS CORAZONES - CAPILLA VIRGEN DE LA PAZ	\$	3,624.85
052-128946	PARROQUIA SAN JOSE DE MAGNOLIA	\$	3,839.40
217-309552	PARROQUIA SAN LUIS GONZAGA	\$	3,856.01
362-121259	PARROQUIA NUESTRA SRA DEL PILAR	\$	4,074.84
765-003728	PARROQUIA SANTA CLARA	\$	4,150.20
030-840759	PARR SANTA TERESA DE JESUS JORNET 137	\$	4,313.1
014-430002	PARROQUIA SAN FRANCISCO JAVIER	\$	4,341.5
229-215186	PARROQUIA MADRE DE LA IGLESIA	\$	4,351.00
030-036151	SANTA IGLESIA CATEDRAL DE SAN JUAN - CARITAS	\$	4,504.8
229-307096	PARROQUIA SANTA MARIA DE LOS ANGELES - FONDO DE CONSTRUCCION	\$	4,688.4
030-838517	PARROQUIA NUESTRA SRA DEL PILAR - CARITA	\$	4,797.0
301-007434	PARROQUIA DE SAN VICENTE DE PAUL	\$	4,853.43
059-003294	PARROQUIA SAN FERNANDO REY	\$	4,871.6
140-207759	PARROQUIA SANTA ELENA	\$	4,963.7
030-688582	PARROQUIA CRISTO REDENTOR	\$	4,974.9
030-815746	PARROQUIA MARIA MADRE DE LA MISERICORDIA	\$	5,220.30
030-688590	PARROQUIA MARIA MADRE DE LA MISERICORDIA	\$	5,254.59
249-012811	PARROQ NTRA SRA COVADONGA CTRO DIVINO NI	\$	5,346.37
240-305923	PARROQUIA NUESTRA SENORA DE COVADONGA	\$	5,409.72
059-017341	PARROQUIA SAN JOSE	\$	5,778.30
115-202064	PARROQUIA SAN AGUSTIN	\$	5,861.23
	PARROQUIA SAN LUCAS - COMITE ACCION SOCIAL	\$	5,954.80
022-358676	PARROQUIA SAN EUCAS - COMITE ACCION SOCIAE PARROQUIA INMACULADO CORAZON DE MARIA	\$	5,962.52
133-430049	PARROQUIA INVIACOLADO CORAZON DE MARIA PARROQ NSTRA SRA VIRGEN DEL CARMEN 132 - CAPILLA SANTA CRUZ	\$	6,077.46
314-007035		\$	6,083.69
036-430188	PARROQUIA SAN FRANCISCO DE ASIS	\$	
223-062986	PARROQUIA SANTO CRISTO		6,195.69
221-049354	PARROQUIA SAN PABLO	\$	6,204.1
030-859824	PARR INMACULADA CONCEPCION-CARITAS 38	\$	6,278.70
011-641843	PARROQUIA SAN FRANCISCO DE ASIS	\$	6,390.80
030-844630	PARR SAN FRANCISCO JAVIER - CARITAS 067	\$	6,523.9
116-267429	PARROQUIA SAN FRANCISCO JAVIER	\$	6,541.0
223-114243	PARROQUIA NTRA SRA DE LOURDES	\$	6,699.2
030-012554	SANTA IGLESIA CATEDRAL DE SAN JUAN	\$	6,733.0
040-142809	PARROQUIA JESUS MEDIADOR	\$	6,965.6
032-867425	PARROQUIA DEL SALVADOR - DBA CAPILLA SAN JOSE DE CALAZANZ	\$	7,015.3
240-204033	PARROQUIA LA MILAGROSA	\$	7,188.52
240-309876	PARROQUIA NTRA SRA DE LA CANDELARIA	\$	7,536.3
131-011804	PARROQUIA SAN JOSE VILLA CAPARRA	\$	7,537.9
030-819474	PARROQUIA ESPIRITU SANTO - CUENTA PASTORAL SOCIAL	\$	7,565.23
170-430138	PARROQUIA SAN JOSE OBRERO	\$	7,592.6
314-006731	PARROQUIA NSTRA SENORA VIRGEN DEL CARMEN - CAPILLA BUENAVENTURA	\$	7,723.5
179-200712	PARR MARIA MADRE DE MI SENOR 145	\$	8,107.7
165-430001	PARROQUIA SAN FRANCISCO DE SALES	\$	8,150.3
030-015847	PARROQUIA MARIA LLENA DE GRACIA	\$	8,519.1
030-819482	PARROQUIA ESPIRITU SANTO - CUENTA OPERACIONAL	\$	8,522.1
015-012697	PARROQUIA NTRA SRA DE LA PROVIDENCIA	\$	8,537.3
038-139006	PARROQUIA NTRA SRA DE LA PROVIDENCIA	\$	8,569.0
030-843308	PARROQUIA SAN FERNANDO REY (116)	\$	8,688.7
030-843308	PARROQUIA SARVERNANDO RET (110) PARROQUIA NUESTRA SENORA DE LA CARIDAD	\$	8,913.6
132-040301	LIBRERIA LA PEQUENA FLOR	\$	8,936.2
030-687764	PARROQUIA NUESTRA SENORA DE GUADALUPE	\$	9,029.5
		\$	9,061.6
217-207644	PARROQUIA SAN ANTONIO	\$	9,215.9
133-430294	PARROQUIA CANANTONIO DE BADIA 115		
000 0000	PARROQUIA SAN ANTONIO DE PADUA 115	\$	9,302.7
058-062041	DARROCHINA MARIE ALDUMAROSA	- 1 -	0 122 4
023-205571	PARROQUIA MARIA AUXILIADORA	\$	9,477.49
023-205571 030-010888	PARROQUIA EL BUEN PASTOR	\$	9,550.0
023-205571			

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Document Page 42 of 67 030-844800 PARROQUIA SANTA BERNARDITA 079 \$ 030-688175 PARROQUIA SANTISIMA TRINIDAD \$ 314-043166 PARROQUIA NTRA SRA DE FATIMA \$ 217-017920 PARROQUIA SANTOS APOSTELES PEDRO Y PABLO \$ 240-052269 PADRES DOMINICOS DE PUERTO RICO INC \$ 024-010952 PARROQUIA DEL PERPETUO SOCORRO \$ 011-012706 SANTA IGLESIA CATEDRAL DE SAN JUAN \$ 226-317036 PARROQUIA DE FATIMA \$ 050-131141 PARROQUIA SANTA RITA DE CASIA 053 \$ 015-011372 PARROQUIA SAN JORGE \$ 132-072645 PARR STO CRISTO DE LA AGONIA \$ 052-473961 PADRES DOMINICOS DE PR PARROQUIA STA CRU \$ 030-688841 PARROQUIA NUESTRA SRA DE LA MONESRRATE \$	9,823.12 9,929.15 10,019.49 10,325.76 10,480.06 10,966.69 11,327.26 11,589.22
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052-473961 PADRES DOMINICOS DE PR PARROQUIA STA CRU \$	12,021.64
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1 030-688841 IPAKKOQQIA NUESTKA SKA DE LA MONESKRATE	12,285.07
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131-295241 PADRES DOMINICOS DE PR INC \$	
	14,254.83 14,713.09
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	16,995.07
	17,188.51
	17,924.81
	18,384.70
	18,852.40
	18,911.13
	19,331.07
	19,464.78
	19,695.88
140-430024 PARROQUIA SANTA MARIA DE CANA \$ 115-496149 PARROQUIA Y ACADEMIA SANTA ROSA \$	20,059.28
365-046735 PRO FONDOS CONST. PARROQUIA STA CLARA \$	20,477.62
030-036186 PARROQUIA SAGRADOS CORAZONES \$	20,520.40
037-061208 PARROQUIA DIVINO NINO JESUS CONSTRUCCION \$	20,563.70
035-038055 PARROQUIA SAN IGNACIO DE LOYOLA \$	20,679.39
203-403487 PARROQUIA DEL SAGRADO CORAZON \$	21,385.55
038-033194 PARROQUIA SAN FRANCISCO DE ASIS \$	21,434.72
228-867045 PADRES DOMINICOS DE PR INC - PARROQUIA DEL PERPETUO SOCORRO \$	22,575.32
030-688183 PARROQUIA BVM DE LOURDES - FONDOS CONSTRUCCION-GRUTA \$	22,709.79
036-032018 PARROQUIA EXALTACION DE LA SANTA CRUZ \$	23,360.65
030-818974 PARROQUIA INMACULADA CONCEPCION-FONDO DE \$	24,873.63
052-645843 PARROQUIA SANTA ELENA \$	25,232.63
030-687772 PARROQUIA NUESTRA SENORA DE GUADALUPE - COL Y PARROQUIA NSTRA GUADALUPE \$	26,641.14
030-815479 PARROQUIA SAN JUDAS TADEO \$	27,430.16
365-041865 PARROQUIA SANTA CLARA \$	27,442.89
250-442061 PARROQUIA SAN JUAN BAUTISTA DE LA SALLE \$	28,013.60
014-207443	28,522.87
058-116036 SANTUARIO CRISTO DE LA RECONCILIACION \$	28,583.25
030-688418 PARROQUIA MARIA REINA DEL MUNDO \$	29,021.57
058-202838 PARROQUIA SENORA DE LA SALUD \$	29,977.76
119-129094 CAPILLA NUESTRA SENORA DE FATIMA CEDROS \$	32,400.01
030-477344 PARROQUIA SAN JORGE \$	32,781.75
239-535516 PARROQUIA LA PIEDAD PASIONISTAS \$	33,027.37
030-817072 PARROQUIA JESUS MEDIADOR \$	35,002.57
223-062986 PARROQUIA SANTO CRISTO \$	41,350.23
056-103336 PARROQUIA ESPIRITU SANTO 072 - CUENTA RESTAURACION/MEJORAS \$	43,805.50
	45,101.25
I 252-867367 IPARROQUIA DEL ESPIRITU SANTO I S	48,657.46
252-867367 PARROQUIA DEL ESPIRITU SANTO \$ 014-002841 PARROQUIA NTRA SRA DE LA PROVIDENCIA \$	

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030-688639	PARROQUIA NUESTRA SENORA REINA DE LA PAZ	\$ 52,828.13
030-689864	PARROQUIA SAN MIGUEL ARCANGEL	\$ 54,067.82
059-029048	PARROQUIA SAN JUDAS TADEO	\$ 54,951.80
118-008609	PARROQUIA SAGRADA FAMILIA	\$ 55,561.17
035-430354	PARROQUÍA EL BUEN PASTOR	\$ 57,348.98
030-870429	PARROQUIA SANTA LUISA DE MARILLAC - CARITAS 35	\$ 58,283.00
240-039640	COMITE DE RESTAURACION TEMPLO	\$ 58,681.18
012-083518	PADRES REDENTORISTAS PARROQ SAN AGUSTIN	\$ 59,392.06
030-688906	PARROQUIA CRISTO SALVADOR	\$ 60,476.15
035-038055	PARROQUIA SAN IGNACIO DE LOYOLA	\$ 63,736.30
058-265236	PARROQUIA SAN ANTONIO DE PADUA - REMODELACION DEL TEMPLO	\$ 66,379.59
030-819458	PARROQUIA SAN MIGUEL ARCANGEL	\$ 69,128.89
013-254006	PARROQUIA SAN JUAN DE DIOS	\$ 80,492.71
133-041379	PARROQUIA SAN JUAN EVANGELISTA - PRO CONSTRUCCION	\$ 82,562.56
252-027060	PARROQUIA SAN ESTEBAN PROTOMARTIR	\$ 98,775.75
040-405850	PARROQUIA DEL SALVADOR	\$ 106,968.51
030-688663	PARROQUIA SANTISIMA TRINIDAD	\$ 110,287.80
030-023327	PARROQUIA PERPETUO SOCORRO - PROFONDO MEJORAS IGLESIA LOURDES	\$ 118,082.01
030-688590	PARROQUIA MARIA MADRE DE LA MISERICORDIA	\$ 183,482.78
362-057765	PARROQUIA SANTA LUISA MARILLAC	\$ 307,526.20
030-476461	PARROQUIA EXATACION DE LA SANTA CRUZ	\$ 402,294.92
170-430014	PARROQUIA SANTISIMA TRINIDAD	\$ 474,909.69
		\$ 4,557,386.06

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	Información Cuentas Embargo		(á
Numero de Cuenta	Parroquia	Cant	idad Embargo
106-006525	ROMAN CATHOLIC CHURCH IN PR - OPERATIONAL ARQ	\$	130,988.06
106-410423	ROMAN CATHOLIC CHURCH IN PR - ARCHIDIOCESE OF SAN JUAN	\$	321,443.76
015-246418	ROMAN CATHOLIC / PARROQUIA SAN MATEO	\$	66,404.12
030-036755	ROMAN CATHOLIC CHURCH IN PUERTO RICO - SEMINARIO SAN JUAN BAUTISTA PONCE	\$	1,348.88
030-388554	ROMAN CATHOLIC CHURCH IN PR - PARROQUIA SAN MATEO	\$	5,111.56
030-388694	ROMAN CATHOLIC CHURCH IN PR - PARROQUIA SAN MATEO	\$	705.18
030-402050	ROMAN CATHOLIC CHURCH IN PR - FONDO RESTAURACION IGLESIAS	\$	1,480.61
030-405572	ROMAN CATHOLIC CHURCH IN PUERTO RICO - CTRO DE EVANGELIZACION Y CATEQUISIS CA	\$.	2,953.18
030-405823	ROMAN CATHOLIC CHURCH IN PR - PASTORAL JUVENIL ARQUIDIOCESANA	\$	2,072.61
030-477220	ROMAN CATHOLIC CHURCH IN PR - TELEORO DONATIVOS	\$	10,079.59
030-688124	ROMAN CATHOLIC CHURCH IN PUERTO RICO - RADIO PAZ WKVM-AM	\$	0.22
030-689082	ROMAN CATHOLIC CHURCH IN PR - LEGADOS & DONACIONES	\$	276.89
030-689120	ROMAN CATHOLIC CHURCH IN PR - FONDO DE SOLIDARIDAD	\$	4,049.06
030-836409	ROMAN CATHOLIC CHURCH IN PR - VICARIA DEL TOA Y LA PLATA	\$	2,026.43
030-838959	ROMAN CATHOLIC CHURCH IN PR - COMISION FORMACION DIACONOS PERMANENTES	\$	1,532.33
030-861896	ROMAN CATHOLIC CHURCH IN PR - COMARCA	\$	17,629.62
106-003798	ROMAN CATHOLIC CHURCH IN PR - SOCIEDAD PROTECTORA DE LOS NINOS	\$	37,505.01
106-007467	ROMAN CATHOLIC CHURCH IN PR - ARQUIDIOCECIS DE SAN JUAN	\$	0.56
106-008242	ROMAN CATHOLIC CHURCH IN PR - ARQUEDIOCESES OF SAN JUAN (NOMIMA)	\$	-
106-011081	ROMAN CATHOLIC CHURCH IN PR - FONDO DE CONSTRUCCION/SANTUARIONTRA	\$	797.03
106-034189	ROMAN CATHOLIC CHURC IN PR - ARQUIDIOCESIC DE SJ / WPRV TV CANAL 13	\$	164.43
		\$	606,569.13

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NO. 31-005247002

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BANCO POPULAR DE PUERTO RICO PO Box 362708 San Juan, Puerto Rico 00936-2708

Date <u>08-23-2018</u> \$ 606569.13

Member FDIC and Federal Reserve System

Pay*****SIX HINDRED SIX THOUSAND FIVE HUNDRED SIXTY NINE DOLLARS AND 13/100*****
To the Order of

ALGUACIL REGIONAL TRIBUNAL DE SAN JUAN

CASO CIVIL: SJ2016CV00131 RE: 34336-22AUG18

#005247002# #021502011# 000#000310#

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l)	Información Cuentas con EIN 660198351 (Hold)				
Numero de Cuenta	Parroquia	Car	itidad en Hold		
240-205764	CATEQUESIS VICARIA BAYAMO	\$	3,222.52		
217-045775	CATEQUESIS VICARIA BAYAMO	\$	128.81		
506-201860	FUNDACION LUIS CARDENAL APONTE MARTI	\$	54,363.35		
039-430014	IGLESIA CATOLICA PARROQUIA	\$	839.83		
059-203005	PARROQUIA LA MILAGROSA	\$	2,683.92		
132-038501	PARROQUIA SAN ANDRES	\$	1,241.50		
052-237419	PIA UNION DEL CLERO SECULAR	\$	9,579.83		
013-349171	PARROQUIA SAN FELIPE APOSTOL	\$	8,110.37		
131-294180	PARR MARIA MADRE DE LA MISERICORDIA 139	\$	5,000.00		
131-294180	PARR MARIA MADRE DE LA MISERICORDIA 139	\$	247,121.95		
030-682274	DEPTO DE DIACONADO PERMANENTE	\$	2,733.13		
059-019638	PARROQUIA LA MILAGROSA	\$	6,424.40		
	A	\$	341,449.61		

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ESTADO LIBRE ASOCIADO DE PUERTO RICO TRIBUNAL DE PRIMERA INSTANCIA CENTRO JUDICIAL DE ARECIBO SALA SUPERIOR

YALI ACEVEDO FELICIANO, JOHN A. WILLIAMS BERMÚDEZ y la sociedad legal de gananciales compuesta por ambos, et al. Demandantes v. LA SANTA IGLESIA CATÓLICA APOSTÓLICA EN LA ISLA DE PUERTO RICO, INC. et al. Demandadas	Civil Núm. SJ2016cv00131 Sala: 904 Sobre: Orden de cese y desista y/o injunction, sentencia declaratoria, cumplimiento de contrato, impedimento por actos propios, daños y perjuicios daños y perjuicios
SONIA ARROYO VELÁZQUEZ, JESÚS M. FRANCO VILLAFAÑE y la sociedad legal de gananciales compuesta por ambos, et al. Demandantes v. LA SANTA IGLESIA CATÓLICA APOSTÓLICA EN LA ISLA DE PUERTO RICO, INC. et al. Demandadas	Civil Núm. SJ2016cv00141 Sala: 904 Sobre: Orden de cese y desista y/o injunction, sentencia declaratoria, cumplimiento de contrato, impedimento por actos propios, daños y perjuicios daños y perjuicios
ELSIE ALVARADO RIVERA, ISIDORO HERNÁNDEZ y la sociedad legal de gananciales compuesta por ambos, et al. Demandantes v. LA SANTA IGLESIA CATÓLICA APOSTÓLICA EN LA ISLA DE PUERTO RICO, INC. et al. Demandadas	Civil Núm. SJ2016cv00156 Sala: 904 Sobre: Orden de cese y desista y/o injunction, sentencia declaratoria, cumplimiento de contrato, impedimento por actos propios, daños y perjuicios daños y perjuicios

URGENTE TERCERA COMPARECENCIA ESPECIAL EN TORNO A ORDEN ENMENDADA DE EMBARGO

AL HONORABLE TRIBUNAL:

COMPARECE el Banco Popular de Puerto Rico ("Banco Popular"), de manera especial y sin someterse a la jurisdicción del Tribunal, por conducto de la representación suscribiente, y muy respetuosamente expone y solicita:

- El 21 de agosto de 2018 se diligenció en Banco Popular los documentos relacionados con el embargo de fondos pertenecientes a la Iglesia Católica.
- 2. Mediante Moción en Cumplimiento de Orden y Mandamiento de Embargo, presentada el 22 de agosto de 2018, Banco Popular informó que había evaluado los documentos diligenciados y no había identificado bienes sujetos a embargo. Indicó, no obstante, que, en el interés de poder realizar una búsqueda efectiva de las cuentas que se interesaba embargar, era necesario que el Señalamiento de Bienes identificara el número de seguro social patronal o los números de cuenta objeto del embargo.
- El 22 de agosto de 2018 se diligenció en Banco Popular un Mandamiento sobre una Orden Enmendada de embargo.
- 4. La Orden Enmendada, recogida en el Mandamiento, dispone para el embargo de "bienes y dineros de la Santa Iglesia Católica Apostólica y Romana y/o Roman Catholic Church in Puerto Rico ..., incluyendo bonos, valores, vehículos de motor, obras de arte, equipo, muebles, cuentas, bienes inmuebles y cualquier otro bien perteneciente a la Santa Iglesia Católica Apostólica y Romana y/o Roman Catholic Church in Puerto Rico y cualquiera de sus dependencias, que esté ubicada en Puerto Rico".
- 5. La Orden Enmendada dispone además que, "[d]e realizarse el embargo sobre sumas de dinero ... bajo posesión, depósito o custodia de terceros, se ordena que el Señor Alguacil realice dicho embargo notificando con copia de esta orden a dichos terceros requiriéndoles que le entreguen de inmediato dichos bienes o que, en caso de que su entrega inmediata sea imposible, retengan los mismos hasta tanto puedan consignarlos en el tribunal, sin que puedan ... entregar estos ni a los demandados ni a ninguna otra persona natural o jurídica ... mientras el Tribunal no disponga otra cosa".
- 6. Por otra parte, el Señalamiento de Bienes identifica los siguientes: "[C]uentas de la Santa Iglesia Católica Apostólica en la Isla de Puerto Rico, Inc. con número de registro corporativo 2944 y/o Roman Catholic Church in Puerto Rico, S.S. 660-XXXX51".
- 7. Cumpliendo con el Mandamiento, la Orden Enmendada y el Señalamiento de Bienes, Banco Popular verificó sus récords y no encontró cuentas registradas a nombre de la Santa Iglesia Católica Apostólica y Romana o la Santa Iglesia Católica Apostólica en la Isla de Puerto Rico, Inc.

- 8. Banco Popular sí identificó cuentas registradas a nombre de Roman Catholic Church in Puerto Rico, con número de seguro social patronal 660-XXXX51. De conformidad con el Protocolo para Facilitar el Trámite de Embargos de Cuentas Bancarias de 14 de junio de 2012, Circular Núm. 34 (Año Fiscal 2011-2012) de la Oficina de Administración de los Tribunales, Banco Popular expidió un cheque por el balance total de los fondos en esas cuentas, el cual entregó al Alguacil del Tribunal.
- 9. Además, Banco Popular identificó varias cuentas con el número de seguro social patronal 660-XXXX51, pero que no están registradas a nombre de la Santa Iglesia Católica Apostólica y Romana, la Santa Iglesia Católica Apostólica en la Isla de Puerto Rico, Inc. o Roman Catholic Church in Puerto Rico, viéndose por ello impedido de entregar los fondos correspondientes al Alguacil. No obstante, cumpliendo con la Orden Enmendada, Banco Popular retuvo dichos fondos, impidiendo transacciones sobre los mismos, mediante un "hold" interno.
- 10. Todo lo anterior fue informado mediante una Urgente Comparecencia Especial en Torno a Orden Enmendada de Embargo, presentada por Banco Popular el 23 de agosto de 2018. En esa Urgente Comparecencia Especial, Banco Popular solicitó dirección en cuanto al tratamiento que debía dar a los fondos en las cuentas con el número de seguro social patronal 660-XXXX51, pero que no están registradas a nombre de la Santa Iglesia Católica Apostólica y Romana, la Santa Iglesia Católica Apostólica en la Isla de Puerto Rico, Inc. o Roman Catholic Church in Puerto Rico.
- 11. Además, en su Urgente Comparecencia Especial, Banco Popular solicitó aclaración en cuanto al alcance de la Orden Enmendada en tanto que ordena el embargo de bienes pertenecientes a "cualquiera de [las] dependencias" de la Santa Iglesia Católica Apostólica y Romana y/o Roman Catholic Church in Puerto Rico.
- El Honorable Tribunal no se ha expresado aún en torno a la Urgente
 Comparecencia de Banco Popular.
- 13. Desde su Urgente Comparecencia, Banco Popular ha identificado alrededor de 160 cuentas adicionales pertenecientes a <u>parroquias</u> de Roman Catholic Church in Puerto Rico. Estas cuentas <u>no están registradas a nombre de</u> Roman Catholic Church in Puerto Rico y <u>tampoco</u> llevan el número de seguro social patronal 660-XXXX51.

- 14. Ante la posibilidad de que dichas cuentas estén cobijadas por los documentos de embargo, Banco Popular ha retenido los depósitos correspondientes, impidiendo transacciones sobre los mismos, mediante un "hold" interno. Estos depósitos, sumados a los previamente embargados y retenidos, totalizan una cantidad suficiente para cubrir los \$4,700,000 establecidos en la Orden Enmendada.
- 15. No obstante, Banco Popular reitera su solicitud de aclaración en cuanto al alcance de la Orden Enmendada en tanto que ordena el embargo de bienes pertenecientes a "cualquiera de [las] dependencias" de la Santa Iglesia Católica Apostólica y Romana y/o Roman Catholic Church in Puerto Rico. En particular, Banco Popular solicita que se aclare si "dependencias" incluye las parroquias de Roman Catholic Church in Puerto Rico.

POR TODO LO CUAL, se solicita respetuosamente que el Honorable Tribunal (1) tome conocimiento de lo anterior, (2) provea dirección en cuanto al tratamiento que Banco Popular debe dar a los fondos depositados en cuentas con el número de seguro social patronal 660-XXXX51, pero que no están a nombre de la Santa Iglesia Católica Apostólica y Romana, la Santa Iglesia Católica Apostólica en la Isla de Puerto Rico, Inc. o Roman Catholic Church in Puerto Rico y (3) aclare el alcance de la Orden Enmendada en tanto que ordena el embargo de bienes pertenecientes a "cualquiera de [las] dependencias" de la Santa Iglesia Católica Apostólica y Romana y/o Roman Catholic Church in Puerto Rico; en particular, si "dependencias" incluye las parroquias de Roman Catholic Church in Puerto Rico.

RESPETUOSAMENTE.

CERTIFICO: Haber presentado el presente escrito mediante el Sistema Unificado de Manejo y Administración de Casos (SUMAC), el cual genera notificación electrónica con copia fiel y exacta del presente a los abogados de récord.

En San Juan, Puerto Rico, hoy, 27 de agosto de 2018.

McCONNELL VALDÉS LLC P.O. Box 364225 San Juan, Puerto Rico 00936-4225 Teléfono: (787) 759-9292 Fax: (787) 759-8282

f/ Eduardo A. Zayas-Marxuach Eduardo A. Zayas-Marxuach TSPR Núm. 12155 ezm@mcvpr.com

Abogados de Banco Popular de Puerto Rico

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EXHIBIT

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C. CONDE & ASSOC.

LAW OFFICES

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August 29, 2018

BY CERTIFIED MAIL AND ELECTRONIC MAIL

Banco Popular de Puerto Rico c/o Eduardo A. Zayas-Marxuach, Esq. McConnell Valdés, LLC PO Box 364225
San Juan, PR 00936-4225
Email: ezm@mcvpr.com

Re: Archdioceses of San Juan

Case No.: 18-04911

Dear Mr. Zayas:

Our firm represents the Archdioceses of San Juan ("The Archdioceses") in its reorganization process pursuant to Chapter 11 of the Bankruptcy Code. On August 29, 2018, the Archdioceses file a petition for relief pursuant to the provisions of Chapter 11 of the Bankruptcy Code. We are herein enclosing copy of the Notice of Filing of the bankruptcy petition issued by the Bankruptcy Court for the District of Puerto Rico.

Upon the filing of the bankruptcy petition and by virtue of Section 362 of the Bankruptcy Code, 11 USC 362, the bankruptcy estate of the Debtor is formed. Among the assets of the bankruptcy estate are certain funds currently being held on an administrative hold by Banco Popular de Puerto Rico ("BPPR") which belong to the Archdioceses as well as funds that belong to its parishes. This administrative hold has been placed account of the Order entered by the First Instance Court, San Juan Part in the cases No.: SJ2016cv00131, SJ2016cv00141 and SJ2016cv00156 on March 27, 2018 ("The State Court Litigation").

Upon the filing of the bankruptcy petition, the State Court Litigation is stayed and thus those funds must be returned to the estate and the parishes pursuant to Section 362 of the Bankruptcy Code. Should BPPR fail to immediate eliminate this administrative hold on the bank accounts of the Archdioceses and/or its parishes, it would be willfully violating the automatic stay provisions and unlawfully exercising control and possession of property of the bankruptcy estate. This action is would leave the Debtor no other alternative than to seek immediate intervention of the Bankruptcy Court and request the corresponding sanctions, attorney's fees and costs.

Cordially,

Feel free to contact the undersigned should you wish to discuss this matter.

With nothing further I remain,

Luisa S. Valle Castro

Cc: Mons. Roberto González Nieves

8/29/2018

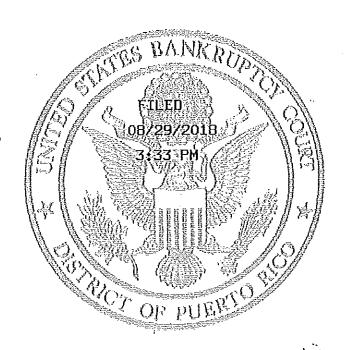
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United States Bankruptcy Court
District of Puerto Rico

Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 08/29/2018 at 3:33 PM and filed on 08/29/2018.

ARQUIDIOCESIS DE SAN JUAN DE PUERTO RICO ANTIGUO COLEGIO MADRE CABRINI URB. CAPARRA HIGH 1564 CALLE ENCARNACION SAN JUAN, PR 00920 Tax ID / EIN: 66-0198351 aka IGLESIA CATOLICA APOSTOLICA Y ROMANA, ARQUIDIOCESIS DE SAN JUAN DE PUERTO RICO



... The case was filed by the debtor's attorney:

CARMEN D CONDE TORRES 254 SAN JOSE STREET 5TH FLOOR SAN JUAN, PR 00901-1523 787-729-2900

The case was assigned case number 18-04911-11.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page www.prb.uscourts.gov or at the Clerk's Office, Jose V Toledo Fed Bldg & US Courthouse, 300 Recinto Sur Street, Room 109, San Juan, PR 00901.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

MARIA DE LOS ANGELES GONZALEZ Clerk, U.S. Bankruptcy Court

PACER Service Center
Transaction Receipt

08/29/2018 15:33:19						
PACER Login:	condecarmen:2527950:0	Client Code:				
Description:	Notice of Filing	Search Criteria:	18-04911-11			
Billable Pages:	1	Cost:	0.10			

Case:18-04911-EAG11 Doc#:26 Filed:09/03/18 Entered:09/04/18 03:04:19

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ESTADO LIBRE ASOCIADO DE PUERTO RICO TRIBUNAL DE PRIMERA INSTANCIA SALA SUPERIOR DE SAN JUAN

esc: Neximbit 9

YALI ACEVEDO FELICIANO,JOHN A. WILLIAMS&CIVIL NUM: S]2016CV00131 BERMUDEZ,SOCIEDAD DE GANANCIALES COMPUESTA POR AMBOS; JUAN D. ALBARRAN RODRIGUEZ,CARMEN M. ALMODOVAR OLIVA,\$ MIGUEL E. ALONSO REYES, MARY L DE GRAUX VILLAFAÑA Y LA SOCIEDAD LEGAL DE SALA 904 GANANCIALES COMPUESTA POR AMBOS, IRAIDA ALVARADO GARCES, LUIS APONTES SANTIAGO, LOURDES ISERN Y LA SOCIEDAD LEGAL DE GANANCIALES COMPUESTA POR AMBOS, MILAGROS ARROYO REYES, JOSE A. SOLIS RIOS Y LA SLG COMPUESTA POR AMBOS. ENID AVILA CARDONA, BORIS CORUJO ORRACA Y LA SLG COMPUESTA POR AMBOS, ANA AYALA SOBRE: TORRES, RAMON ORTIZ Y LA SLG COMPUESTA POR AMBOS, ESTHER C. BARRERA,GLORIAS

CARABALLO FIGUEROA, JORGE LUIS LEAVITT Y ORDEN DE CESE Y DESISTA Y/O
LA SLG COMPUESTA POR AMBOS, GLORIA M. SINJUNCTION, SENTENCIA CERRA QUINONES, JAIME LOPEZ DIAZ Y LA SLG DECLARATORIA, CUMPLIMIENTO COMPUESTA POR AMBOS, ERNESTO N. CHIESA DE CONTRATO, IMPEDIMIENTO FIGUEROA, MARIA E. BAEZ BELLO Y LA SLG POR ACTOS PROPIOS, DAÑOS Y CHIRLOLDES CARBIA, RAMONITA COVAS PERJUICIOS BERNIER, MARIA M. CRUZ CASSE, JOSE F. UMPIERRE RIVERA Y LA SLG COMPUESTA POR AMBOS, LUZ D. CRUZ RODRIGUEZ, FRANCISCO E. DE LOS SANTOS AQUINO, MARIA DEL C. ORTIZ NAVARRO Y LA SLG COMPUESTA POR AMBOS, YOLANDA M. ELIZONDO DEL PINO, VIRGILIO ESPINAL WALLACE, SANTA LEBRON FERRARA Y LA SLG DE BIENES GANANCIALES COMPUESTA POR AMBOS, MAIRA JOSE FERNANDEZ MAGADAN, CLARA E. FERNANDEZ SISSA, SARITA FONT RODRIGUEZ, JOSE M.S CASTRO PAVIA Y LA SLG COMPUESTA POR AMBOS, ALFREDO GARCIA, MARIBEL CASANOVA Y LA SLG COMPUESTA POR AMBOS LIZ GARCIA DAVILA, VANESSA GARCIA DAVILA, HECTOR JORGE MONSERRATE Y LA SLG COMPUESTA POR AMBOS, IVELISSE GARCIA VEGA, FRANCISCO J. MIRANDA DEL VELLA Y LA SLG COMPUESTA POR AMBOS, LYMARIS GONZALEX SIERRA, REYNALDO ORTIZ Y LA SLG COMPUESTA POR AMBOS, ELBA GUTIERREZ SCHMIDT, HECTOR JULIAN LANZO ROLDAN, LYDIA RIVERA FLORES Y LA SLG COMPUESTAS POR AMBOS, JOSE MANUEL LEAVITT REY, CARMEN E LEDESMA MENDEZ, CLAUIDIO E. ACARON BONILLA Y LA SLG COMPUESTA POR AMBOS, CLARITA LIDIN DEL ROM, CARLOS ROM GORIS Y LA SLG COMPUESTA POR MABOS, TERESA LOPEZ GUZMAN, LIGIA LOPEZ OLIVER, CHRISTINE M. LUGO QUESADA, CARLIXTA MARTINEZ VILORIO, RONNY ECHEVARRIA Y LA SLG COMPUESTA POR AMBOS, AWILDAS MELENDEZ RIOS, EDWIN SANCHEZ MALDONADO Y LA SLG COMPUESTA POR AMBOS, EDDA I. MELENDEZ RIVERA, YEIDY R. OLIVER HERNANDEZ, JESUS ORTIZ GARCIA MARTA VILLAMIL RODRIGUEZ Y LA SLG COMPUESTA POR AMBOS, DIANA ORTIZ RODRIGUEZ NERIROSO OTERO ROMERO, ALBERTO DEL TORO Y LA SLG COMPEUSTA POR CARMEN PRISCILLA PAVIA8 CABANILLAS, FRANCISCA RAMIREZ, LUIS DARIO TINEO SANCHEZ Y LA SLG COMPJESTA POR AMBOS, MILAGROS RAMOS, ALONSO DE HOYOS Y LA SLG COMPUESTA POR AMBOS, JUAN M. RAMOS PIZARRO, CARRASQUILLO MARQUEZ Y LA SIG COMPUESTA POR AMBOS, IRAIDA RINALDI CARRASQUILLO MARQUEZ Y COMPUESTA POR AMBUS, IRAIDA MINALDI RIOS, FERNANDO QUIÑONES APONTE Y LA SLG COMPUESTA POR AMBOS, CARLOS JUAN RIVERA PADUA, NOELIA M. TORRES COTTS Y LA

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SLG COMPUESTA POR AMBOS, GEORGINAS RODRIGUEZ, DIANA ROCHE\ RODRIGUEZ RIIOS, ANGELA RODRIGUEZ COLON, PEDRO A. DEL VALLE FERRER Y LA SLG COMPUESTA POR AMBOS, CARLOS RUIZ PORRATA, SYLVIA RAMOS MOREAU Y LA SLG COMPUESTA POR AMBOS, CARMEN C. RUIZ REXACH, MARLENE RUIZ RUIZ, JORGE A. SALDARRAIGA BARRAGAN Y LA SLG COMPUESTA POR AMBOS, MAIRA VICTORIA SAIZ MARTINEZ, RAMIRO JORDAN SARRIA Y LA SLG COMPUESTA POR AMBOS, OSCAR SANCHEZ CALDO DEL CALD DEL CAMPO DELGADO, DIANA SARDIÑA HERNANDEZ, JORGE ESCOBÁR Y LA SLG COMPUESTA PORMABOS, YOLANDA SEDA BENITEZ, MANUEL A. PEREZ SANCHEZ Y LA SLG COMPUESTA POR AMBOS, AMELIA SOTOMAYOR DIAZ, LUIS DARIO TINEO SANCHEZ, FRANCISCA RAMIREZ NUNEZ Y LA COMPUESTA SLG COMPUESTA POR AMBOS, RITA I. TORO MONSERRATE, MIGUEL A. HERNANDEZ FELICIANO Y LA SLG COMPUESTA POR AMBOS, NOELIA TORRES COTTS, CARLOS J. RIVERA NOELIA TORRES COTTS, CARLOS J. RIVERAN PADUA Y LA SLG COMPUESTA POR AMBOS, LIANIS Z. VELEZ PEREZ, JULIO RODRIGUEZ ODUM Y LS SLG COMPUESTA POR AMBOS.

DEMANDANTES

LA SANTA IGLESIA CATOLICA APOSTOLICA EN LA ISLA DE PUERTO RICO, INC., REP. POR MONSEÑOR ROBERTO GONZALEZ NIEVES, EN SU CAPACIDAD COMO ARZOBISPO DE SAN JUAN, ACADEMIA DEL PERPETUO SOCORRO, SUPERINTENDENCIA DE LAS ESCUELAS CATOLICAS DE LA ARQUIDIOCESIS DE SAN JUAN, FIDEICOMISO DEL PLAN DE PENSION PARA EMPLEADOS DE ESCUELAS CATOLICAS,

DEMANDADOS

Isonia arroyo velazquez, jesus m. franco∦CIVIL NUM: SJ2016CV00146 VILLAFAÑE Y LA SLG COMPUESTA POR AMBOS, HECTOR LUIS BAEZ RODRIGUEZ, ANA TERESITA BORGES RODRIGUEZ, ALICIA CASTILLO PEÑA, WILLIAM MANGUAL CASTILLO PEÑA, WILLIAM MANGUAL MARTINEZ Y LA SLG COMPUESTA POR AMBOS, SALA 904 MIRIAM CORTES PEREZ, ELSIE DE JESUS ROSADO, ISABEL DEL VALLE RIVERA, SARA J DISDIER CABALLERO, ELENA DURAN SOBRINO, MARIA M. ESPINOSA MIRANDA, ARIEL PAGAN RODRIGUEZ Y LA SLG COMPUESTA POR AMBOS, MARLIA FELICIANO SANTANA, CARLOS M. MELENDEZ Y LA SLG COMPUESTA POR AMBOS. AMARILIS FLORES CRUZ, ALFONSO GARCIA SOBRE: AMARILIS FLORES CRUZ, ALFONSO GARCIA SOBRE:
RUIZ Y LA SLG COMPUESTA POR AMBOS, EVA J.
FREIRE, FELIX J. LUGO SOTO Y LA SLG
COMPUESTA POR AMBOS, IVETTE FUENTES ORDEN DE CESE Y DESISTA Y/O
FLEBLES, GLENDA GARCIA MARTINEZ, MARIA INJUNCTION, SENTENCIA
T. GESWALDO MEDINA, SANDRA IVETTE GRAU DECLARATORIA, CUMPLIMIENTO
MORALES, PEDRO RI. VILLALTA BERNABE Y LA DE CONTRATO, IMPEDIMIENTO
SLG COMPUESTA POR AMBOS, IVELISSE LABOY POR ACTOS PROPIOS, DAÑOS Y
BIENES GANANCIALES COMPUESTA POR PERJUICIOS
AMBOS, MARIA ANGELIE LAMBOGLIA VILA,
IOSE F. ADROVER ROBLES Y LA SLG COMPUESTA JOSE F. ADROVER ROBLES Y LA SLG COMPUESTA POR AMBOS, ANA DORIS LLADO SILVA, LESLIE JANETTE LOPEZ BAEZ, JUAN CARLOS GONZALEZ RODRIGUEZ, Y LA SLG COMPUESTA POR AMBOS, NILSA LOPEZ MARCANO, TENSY MACHARGO ENRIQUEZ, OMAYRA MARRERO SANTIAGO, MIGUEL ANGEL LOZADA Y LA SLG COMPUESTA POR AMBOS, FLORIN M. MARTINEZ FONTAN, ANGEL M. DE LA ROSA SCHUCK Y LA SLG COMPUESTA POR AMBOS,

JANICE MERCADO CORUJO, VICENTE ROMAN ARRIAGA Y LA SLG COMPUESTA POR AMBOS, NEREIDA MONTES BURGOS, SAMUEL MONGE PEREZ Y LA SLG COMPUESTA POR AMBOS, LILLIAN OTERO CABRERA, ALMA PADILLA MORALES, MINU DERBHIS PAGAN RAMOS, ISMAEL PLACA ESTREMERA Y LA SLG} COMPUESTA POR AMBOS, ANA L PEREZ PEREZ EILEEN PEREZ REYES, JOSE JAVER SANTOS MIMOSO Y LA SLG COMPUESTA POR AMBOS, LOURDES PUIG SANCHEZ, CARLOS E. CHAPEL PALERM Y LA SLG COMPUESTA POR AMBOS, AYRICELL QUINTANA MUÑIZ, SONIA M. RAMOS 🖔 GONZALEZ, REINALDO SANTANA Y LA SLG COMPUESTA POR AMBOS, NILDA RIVAS LABOY, JUAN MEDINA CASTRO Y LA SLG COMPUESTA AMBOS, PEDRO RIVERA ORTIZ, MARGARITA RIVERA ROSADO, WANDA RIVERA VEGA, ERNESTO MALDONADO OJEDA Y LA SLG COMPUESTA POR AMBOS, EVELYN D. RODRIGUEZ SOTO, GLADYS J. RODIRUGEZ SULIVERES, BRENDA RODRIGUEZ TORO DE DAMIANI, NICHOLAS DAMIANI LOPEZ Y LA SLG 🖁 COMPUESTA POR AMBOS YOLANDA RODRIGUEZ TORO DE GIL, LUIS A .GIL BORGOS Y LA SLG COMPUESTA POR AMBOS, JEANETTE ROIG LOPEZ, JOSE A. RIVERA Y LA SLG COMPUESTA POR AMBOS, EDDIE W. SANTIAGO FIGUEROA, CARMEN SANTIAGO HERNANDEZ, FE MIGADILIA SANTIAGO PADILLA, CARMEN SANTINI RIVERA, DORA PADILLA, CARMEN SAISTINI ATTEMPORATION OF THE INTERPORT O VARGAS Y LA SLG COMPUESTA POR AMBOS, LEONOR VELEZ ORTIZ, ISRAEL MENCHACA DOBAL Y LA SLG COMPUESTA POR AMBOS, YOLANDA VELEZ ROSADO, FERNANDO SANCHEZ SALDAÑA DOBAL Y LA SLG COMPUESTA POR AMBOS, BRENDA WHARTON FLORES DEMANDANTES

LA SANTA IGLESIA CATOLICA APOSTOLICA EN LA ISLA DE PUERTO RICO, INC., REP. POR MONSEÑOR ROBERTO GONZALEZ NIEVES, EN SU CAPACIDAD COMO ARZOBISPO DE SANS JUAN, ACADEMIA DEL PERPETUO SOCORRO, SUPERINTENDENCIA DE LAS ESCUELAS CATOLICAS DE LA ARQUIDIOCESIS DE SANS JUAN, FIDEICOMISO DEL PLAN DE PENSION PARA EMPLEADOS DE ESCUELAS CATOLICAS,

DEMANDADOS

******************************* ALVARADO RIVERA, ELSIE ALVARADO RIVERA, ISIDODRO CIVIL NUM: SJ2016CV00156 AMBOS, ESTHER M. ALVAREZ MELENDEZ, JAVIER O. TORRES Y LA SLG COMPUESTA POR AMBOS, MARGARITA ALVAREZ RODRIGUEZ, LIONEL ARROYO CARRERO, ADA L. ARROYO SANCHEZ, JOSE A. HERNANDEZ NIEVES Y LA SLG COMPUESTA POR AMBOS, ZENAIDAS BASORA URRUTIA, HERMES ROMAN AMADOR Y LA SLG COMPUESTA PORA MBOS, LUIS A. CARRION PEREZ, SILVIA E. CASIANO TELLADO, SALA 904 GERARDO F. LOPEZ MUNOZ Y LA SOCIEDAD LEGAL DE BIENES GANANCIALES COMPUESTA POR AMBOS, BARGARA V. CASIANO VELAZQUEZ, LUISA M. CASTRO RIVERA, JAIME LUIS GARCIA GARDA Y LA SLG COMPUESTA POR AMBOS, CARMEN M. CRESPO, ANDRES DURAN CASTAÑOS, VANESSA FIGUEROA GONZALEZ Y LA SLG COMPUESTA POR AMBOS, ZONYA SOBRE: ESPINOSA TARNIELLA, DORA FERNANDEZ PADILLA, GLADYS M. FIGUEROA GAUTIER,

RICHARD ZAMBRANA Y LA SLG COMPUESTA ORDEN DE CESE Y DESISTA Y/O POR AMBOS, AUDILIA FUENTES SANTOS ORDEN DE CESE Y DESISTA Y/O LOURDES GODEN GAUD, ELIUD A SERRANO INJUNCTION, SENTENCIA GONZALEZ Y LA SLG COMPUESTA POR AMBOS, DECLARATORIA, CUMPLIMIENTO CONTRACT TO AMBOS, SECURITY OF AMBOS, SECURITY OF AMBOS, ROSA D. HERNANDEZ ROSADO, PERJUICIOS

RICHARDO LEBRON MALDONADO Y LA SLO COMPUESTA POR AMBOS, JANINE HIDALGO SANTIAGO, HECTOR MARTINEZ TOSADO Y LA SLG COMPUESTA POR AMBOS, ALICE M. HUYKE SOUFFRONT, CARLOS E. JIMENEZ TORRES Y LA SLG COMPUESTA POR AMBOS, OLGA M. JAUME TAPIA, ANTONIO BIENES GANANCIALES COMPUESTA POR AMBOS, MARIA L JULIA JULIA, MIGUEL ANGLE RIOS GERENA Y LA SLG🎖 COMPUESTA OR AMBOS, ANA R. JULIA SAVARIT, LINDA LOPEZ ARRIAGA, JOSE RYES ROSARIO Y LA SLG COMPUESTA POR AMBOS ARLENE LOPEZ CANCEL, LUIS A . MARTINEZ VAZQUEZ, 🖇 FELICITA MONTANEZ FIGUEROA, MIGUEL A. ALBARRAN REYES Y LA SLG COMPUESTA POR AMBOS, ASMARA MORALES YEPES, CARMEN T. MORRIS ZAMORA, VIVIAN ORTIZ SCHETTINI, MARIA DE LOS A. PACHECO RODRIGUEZ ALFRED DEMEL Y LA SLG COMPUESTA POR AMBOS, YANIRA PADILLA SANTIAGO, ELIEZER PARRILLA MELENDEZ, MARIA GARCIA MONTANEZ Y LA SLG COMUESTA POR AMBOS, LIZA POLANCO PAGAN, WALTER RICARDO BONILLA SANTALIZ Y LA SLG COMPUESTA POR AMBOS, MYRNA QUIJANO GUILLAMA, SONIA RIVERA COLON, JORGE ARIEL VAZQUEZ ROMAN Y LA SLG COMPUESTA POR AMBOS, IRIS RODRIGUEZ DELGADO, ANGEL F. ROLON RIVERA, MARIA TERESA DEL VALLE Y LA SLG. COMPUESTA POR AMBOS, GINNETTE ROSADO TORRES, MRIA S. URANGO SALCEDO Y LA SLG COMPUESTA POR AMBOS, FANIVEL ROSARIO SANTIAGO, ADELA SABATIER AGUILA, RUDY E.§ MAYOL KAUFFMANN Y LA SLG COMPUESTA POR AMBOS, MAYRA E. SOTO GUZMAN, JOSE A. CANDELARIO MALDONADO Y LA SLG COMPUESTA POR AMBOS, NELLY-ANN SUAREZ PESANTE, ANA M. TIRADO COLON, YARIM E. CROS VAZQUEZ Y LA SLG COMPUESTA POR AMBOS, CLARA L TIRADO RIOS, SAMUEL LOPEZ PEREZ, Y LA SLG COMPUESTA POR AMBOS, AURIN VALCARCEL CERVERA, MIRTELINAS VAZQUEZ ROBLES, JOSE V. TORRES RIVERA Y LA SLG COMPUESTA POR AMBOS, MIRIAM VILLARDEFRANCOS VERGARA, LOURDES M. ZEGRI PRIETO, CARLOS E. RENTAS GIUSTI Y LA SLG COMPUESTA POR AMBOS

DEMANDANTES.

VS.

LA SANTA IGLESIA CATOLICA APOSTOLICA EN LA ISLA DE PUERTO RICO, INC., REP. POR MONSEÑOR ROBERTO GONZALEZ NIEVES, EN SU CAPACIDAD COMO ARZOBISPO DE SANS JUAN, ACADEMIA DEL PERPETUO SOCORRO, SUPERINTENDENCIA DE LAS ESCUELAS SUPERINTENDENCIA DE LAS ESCUELASS CATOLICAS DE LA ARQUIDIOCESIS DE SANS JUAN, FIDEICOMISO DEL PLAN DE PENSIONS PARA EMPLEADOS DE ESCUELAS CATOLICAS DEMANDADOS.

SENTENCIA

Vista la Notificación sobre Presentación de Quiebra y Solicitando Paralización de Procedimientos presentada el 29 de agosto de 2018, por las partes codemandadas, donde indica que la Arquidiócesis de San Juan se acogió a la protección de ley de Quiebra por el Capítulo II con el número de caso 18-04911-11, radicado en Corte de Quiebra de los Estados Unidos de América y firmada el 29 de agosto de 2018, el Tribunal la declara Ha Lugar.

En virtud de lo expuesto, se ordena la paralización de los procedimientos y el archivo, sin perjuicio de la demanda de epígrafe para fines estadísticos.

El Tribunal se reserva jurisdicción para su reapertura al estado procesal actual, tan pronto sea descargado el procedimiento de quiebra y así se solicite.

REGISTRESE Y NOTIFIQUESE.

En San Juan, Puerto Rico, a 30 de agosto de 2017.

f/ ANTHONY CUEVAS RAMOS JUEZ SUPERIOR Case:18-04911-EAG11 Doc#:26 Filed:09/03/18 Entered:09/04/18 03:04:19 December Page 60 of 67

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Nombre de Parroquia	Loan #	Facility Type	Maturily Date	Orlginal Amount	Principal Outstanding Balance as of 8/28/2018	Brimb
SAN ESTEBAN PROTOMÁRTIR	0052	T/L	03/01/20	859,000.00	635,012.69	7.00%
PARROQUIA CORAZON DE MARIA	0059	1/L	01/01/19	120,000.00	59,649.80	5.75%
SAN JUAN EVANGELISTA	7001	T/L	08/17/24	600,000.00	135,491.27	5.00%
PARROQUIA SAN ANTONIO DE PAUDA (Dorado)	9040	T/L	02/01/29	1,700,000.00	963,517.68	5.00%
SAN FRANCISCO JAVIER	0013	T/L	05/31/23	538,000.00	68,560.13	6.80%
		T/L	09/30/23	1,075,000.00	296,751.35	6.80%
NMACULADA CONCEPCIÓN COLEGIO NUESTRA SEÑORA DE LOURDES	9061	T/L	03/01/19	503,372.00	37,120.64	6.99%
JUESTRA SENORA DE COVADONGA	0042	T/L	03/01/20	100,503.79	60,844.26	6.999
PARROQUIA SANTO CRISTO DE LOS MILAGROS	9070	T/L	03/01/20	485,763,98	196,566.07	6.75%
ANIA IEKESA DE JESUS		T/L	11/16/21	58,025.06	43,985.03	7.65%
ANTO DOMINGO DE GUZMAN	9072	T/L	11/22/21	122,060.88	112,021.29	7.65%
IAN JUAN DE LA CRUZ	9073	T/L	06/21/23	3,378,078.00	3,362,863.94	4.009
A MILAGROSA	9074	T/L	06/28/22	82,835.70	66,296.70	5.75%
MARIA MADRE DE MI SENOR	9076	T/L	06/28/23	142,201.22	141,374.62	5.75%
SAN PIO X	9077	T/L	06/28/23	92,345.59	91,810.59	6.95%
SPIRITU SANTO	0028	T/L	04/16/23	275,000.20	68,924.59	6.80%
SURIO SANO	9075	T/L	06/28/23	83,165.71	82,651.31	5.75%
CRISTO REY	0040	T/L	07/30/24	200,000.00	63,673.46	6.80%
	0051	T/L	12/30/25	50,000.00	19,309.78	6.80%
ROMAN CATHOLIC CHURCH - ID#0072311				9,857,186.22	6,506,425.20	

UNSWORN STATEMENT UNDER PENALTY OF PERJURY

I, Father Alberto Figueroa, of legal age, single, resident of San Juan and General Vicar of the Arquidiócesis de San Juan de Puerto Rico (" the Archdiocese") under the most solemn oath declare as follows:

- 1. That I have the above stated personal circumstances.
- 2. That I am the General Vicar of the Archdiocese.
- That the Archdiocese has an Employer Identification Number: 66-098351 issued by the Department of Treasury, Internal Revenue Service. (See Exhibit 1 to the Complaint)
- 4. That the Archdiocese multiple bank accounts in Banco Popular de Puerto Rico ("BPPR") under EIN 66-0198351. (See Exhibits 5 and 6 of the Complaint)
- 5. That the Archdiocese serves as guarantor to multiple loans made by the parishes with BPPR in the total amount of over \$6.5M. (See Exhibit 10 of the Complaint)

 The Archdiocese is also guarantor to the Parishes in additional loans with other banks.
- 6. That the Archdiocese owns real property throughout the ecclesiastical territory which is registered in the Registry of Property under its name.
- 7. The Archdiocese is an unincorporated Catholic religious association, comprising the northeast portion of the island of Puerto Rico. It was canonically erected by Pope Julius II on August 8, 1511. What is known today as the Archdiocese of San Juan, was named at that time the Diocese of Puerto Rico. On November 21, 1924 its name was changed to the Diocese of San Juan in Puerto Rico, upon the creation of the Diocese of Ponce. With the creation of the Diocese of Arecibo on April 30,

- 1960, San Juan was raised to the status of an archdiocese, with the new Archbishop leading the ecclesiastical territory. Thereafter, the Diocese of Caguas was canonically erected on November 4, 1964, the Diocese of Mayaguez on March 1, 1976 and the Diocese of Fajardo-Humacao on May 11, 2008.
- 8. The Archdiocese of San Juan is composed of six (6) episcopal geographical regions as follows: (i) Vicary of Bayamón, (ii) Vicary of Carolina, (iii) Vicary of El Toa and La Plata, (iv) Vicary of Guaynabo/Puerto Nuevo, (v) Vicary of Río Piedras and (vi) Vicary of San Juan/Santurce. There are approximately 127 parishes and 138 chapels dedicated to the religious mission of the Catholic Church located within the vicaries. See Exhibit 3 of the Complaint.
- 9. Currently, the Archdiocese has 66 direct employees, providing also approximately 200 indirect jobs. Nevertheless, it is of utmost importance that aside from the direct and indirect jobs that the Archdiocese provides, its outreach impacts approximately 1,000,000 Catholics through the associated parishes, chapels, catholic schools, special institutions, seminars, homes and sanctuaries.
- 10. On August 29, 2018, the Archdiocese filed for relief pursuant to the provisions of Chapter 11 of the Bankruptcy Code. Since then, it has remained as Debtor in Possession, in compliance with all the requirements of the Bankruptcy Code and the US Trustee guidelines.
- 11. The Archdiocese's Chapter 11 bankruptcy filing was prompted by the series of <u>prejudgment</u> attachments made on account of an order entered by the First Instance Court, San Juan Part in the State Court Litigation.

- 12. The State Court Litigation is centered on claims made by several beneficiaries to a multiple employer Pension Plan created by the Superintendence of the Catholic Schools of the Archdiocese of San Juan which was terminated in 2016. The Archdiocese was one of the participating employers. As of this date there is no adjudicated liability to any of the employers of the Pension Plan, nor has the case even gone to trial. Furthermore, the Parishes were not a named defendant in this case, nor were they an employers under the Plan.
- 13. Within the one (1) week prior to the bankruptcy filing Defendants caused the attachment of certain account holding the approximate amount of \$4.7M. These attachments were effected against the accounts of the Archdiocese and the Parishes, who were never part of the litigation.
- 14. The majority of the funds are currently held in bank accounts located in BPPR which are currently subject to an administrative freeze. Of these funds \$3.8M are funds of the Parishes of the Archdiocese. See Exhibit 4 of the Complaint. There are still also certain funds of the Archdiocese that were garnished through the Marshal's Office of the Court of First Instance of Puerto Rico, San Juan Part.
- 15. In sum the total amounts that were garnished or subject to an administrative freeze are as follows¹:
 - a. 21 accounts under Archdiocese's EIN and name in the total amount of \$606,569.13. These amounts were attached and a check was given to the marshal by BPPR for this amounts.² See Exhibit 5 of the Complaint.

¹ These amounts were provided by BPPR but may be subject to change and verification by the Archdiocese.

² After the automatic stay was entered, these funds have been requested but the Marshal has refused to return the same.

- b. 12 accounts with the Archdiocese's EIN, but in the name of related third parties, in the total amount of \$341,449.61. The attachment of the funds in these accounts was unperfected at the time of the bankruptcy filing. Therefore the funds were "released". See Exhibit 6 of the Complaint.
- c. At least 160 accounts in the name and EIN of the Parishes in the total amount of \$3.8M. These funds are currently subject to an "administrative freeze" pending entry of an order by this Court.⁴
- 16. On the date of the filing of the bankruptcy petition the Archdiocese, through counsel, contacted BPPR in order to request the release of all of the frozen funds.
 See Exhibit 8 of the Complaint.
- 17. Upon the filing of the Archdiocese's bankruptcy petition the State Court Litigation was stayed by the Court of First Instance and the case was closed. See Exhibit 9 of the Complaint.
- 18. BPPR "released" the funds that were under the EIN number of the Archdiocese.⁵
 BPPR has maintained the "administrative freeze" of at least 160 accounts of the Parishes. The Parishes have little or no money to operate since their account balances have been frozen.
- 19. Upon information and belief, after the filing of the bankruptcy petition the Defendants, through counsel, have sought to enforce the attachment order and threatened BPPR with litigation, should the bank release the funds of the Parishes.

³ Even though BPPR informed the Archdiocese that it had "released" these accounts, the Archdiocese has been informed that BPPR has denied access to the funds.

⁴ BPPR requested on three (3) occasions that the state court clarify the extent of the attachment order to no avail. See Exhibit 7 of the Complaint.

⁵ Even though BPPR informed the Archdiocese that it had "released" these accounts, the Archdiocese has been informed that BPPR has denied access to the funds.

- 20. The inability of the Archdiocese and the Parishes to access the funds has severely impacted the entire operation and mission of the Parishes and the Archdiocese.
- 21. The Parishes need on urgent basis to have access to the frozen funds in the BPPR accounts to continue with their operation and their Catholic mission. The lack of funds to operate causes irreparable harm to the Parishes and consequently to the Archdiocese.
- 22. The Archdiocese needs to maintain its operation in order for the Catholic mission of the Church to evangelize through the Parishes. If the Parishes close because they cannot operate due to the lack of funds, the operations and mission of the Archdiocese will be hampered. This will not only impact the Archdiocese and the Parishes, but also approximately 1,000,000 Catholics in the Archdiocese of San Juan.
- 23. Moreover, the economic condition of the Archdiocese will worsen since BPPR will claim to the bankruptcy estate approximately over \$6.5M in loans given to the Parishes and guaranteed by the Archdiocese. Also, the Archdiocese will be subject to claims from other banks to which it has given guarantees on behalf of loans provided to the Parishes. See Exhibit 10 of the Complaint.
- 24. Furthermore, the Parishes provide significant income to the Archdiocese. Should the Parishes stay the contributions to the Archdiocese, it will have less funds available to provide payment to its creditors through a Plan of Reorganization.
- 25. Up to this date the Debtor and the Parishes face a financial crisis, which includes, but is not limited to:

- a. Imminent hampering of operation of the Parishes which would redound in extreme limitation of the Catholic mission and the services provided to approximately 1,000,000 Catholics in the San Juan Archdiocese
- b. Erosion of confidence in the Debtor and its Parishes by the public;
- c. Delay in the on-time payment of the payroll of the employees of the Parishes needed to maintain the operations in the Parishes.
- d. The lack of payroll payments has again impacted the stability of the staff of the Parishes and their ability to comply with their independent financial commitments.
- e. The possible resignations of the employees the Parishes could most likely result in the closing of the Parishes or limitation of their services and their ability to continue with their mission and impacting the Archdiocese with its duty to provide its services to the Catholic community.
- f. The inability of the Parishes to provide payment to the health plan which covers not only the employees but also the active priests and the retired priests, some which have health conditions that require immediate care and attention.
- g. The inability of the Parishes to comply with their financial obligations to their respective secured creditors, including but not limited to utilities, mortgages, governmental institutions and other vendors.
- h. The ability of the Parishes to conduct the charitable services and assistance that they provide to the homeless and underprivileged population in the archdioceses, including but not limited to programs like Cáritas, who helps

a Cáritas program. The Cáritas program impacts hundreds of thousands of

people in need.

i. The income of the Archdiocese will also be affected since approximately

14% of its income comes from the Parishes. Thus, the reorganization

process will be affected since the funds available to pay creditors will be

reduced.

j. If the Parishes do not have immediate access to the funds that have been

frozen in their BPPR accounts, their daily operations will be heavily

impacted, including but not limited to the payments for maintenance,

utilities, food, transportation etc. This does not include the impact to their

Catholic mission. This will in turn have a direct impact in the operations of

the Archdiocese and in its reorganization.

k. Moreover, the Parishes have the obligation to pay the health insurance and

maintenance of the priests. If the Parishes do not have the funds to make

such payments, the Archdiocese has the obligation to provide for such

payments.

That the above stated is the truth and nothing but the truth and I declare the same under penalty

of perjury.

In San Juan, Puerto Rico, this 3rd day of September, 2018.

Father Alberto Figueroa

General Vicar of the Arquidióceses de San Juan de Puerto Rico